

TOWN OF ARLINGTON MASSACHUSETTS

REPORT OF THE MBTA COMMUNITIES WORKING GROUP



TO THE ARLINGTON REDEVELOPMENT BOARD
and TOWN MEETING

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Letter from the Director of the Department of Planning and Community Development and the Chair of the MBTA Communities Working Group

Dear Members of the Redevelopment Board and Town Meeting Members,

We are pleased to present to you this report of the MBTA Communities Working Group (Working Group).

This report sets forth the rationale for the Working Group's proposal for an overlay zoning district to allow by-right multi-family housing in Arlington in accordance with Section 3a of M.G.L. Chapter 40A and guidelines released by the Executive Office of Housing and Livable Communities (EOHLC), formerly known as the Department of Housing and Community Development (DHCD).

The Working Group's recommendations are the product of eight months of public engagement, research, and deliberation with support from the Department of Planning and Community Development (DPCD) and the Diversity, Equity, and Inclusion Division. The timeline for this project was challenging, but the Working Group has crafted a thoughtful proposal that reflects the needs and values of the Arlington community.

A particular highlight for both of us was the June 8th public forum, which had overflow capacity, and featured community members sitting around tables with maps discussing where and how to allow multi-family housing in Arlington. The positive energy and conversations from that evening have continued to influence us through the many long meetings required to complete the Working Group's proposal.

The Working Group has created a proposal that over time will result in new multi-family housing and helps Arlington make progress on the goals we share as a community: to be welcoming and inclusive, to be climate leaders, to give access to our open spaces, and to support vibrant businesses.

We hope that you will give careful and serious consideration to the Working Group's proposal for an overlay zoning district to allow by-right multi-family housing in Arlington and we respectfully request that you vote to support this proposal.

Sincerely,

Claire Ricker
Director of Planning and Community Development

Sanjay Newton
Chair, MBTA Communities Working Group

Executive Summary

Arlington and the greater Boston region need more housing in a variety of sizes and at a variety of price points. Our region is experiencing a well-documented housing crisis because we have not built enough new homes to keep up with economic and population growth in recent decades. Massachusetts has among the highest, and fastest growing, home prices and rents of any state in the nation, and Arlington is part of this trend. The State's Future of Work study estimated a shortage of up to 200,000 homes. The relentless demand for homeownership opportunities in the Boston Metro Area's high-cost market has contributed to a gradual drop in Arlington's rental supply, with continued conversions of older two-family dwellings from rental housing to condominiums and consolidating most rental properties in East Arlington along Massachusetts Avenue.

The multi-family housing requirements for MBTA Communities come from Massachusetts General Law Chapter 40A Section 3A ("Section 3A"), which was enacted in 2021. The law requires each of the 177 MBTA Communities (as defined in General Law 161A, Section 1) to provide at least one zoning district where multi-family housing (three or more dwellings) is allowed by right. The zoning must allow at least 15 dwelling units per gross acre, not be age restricted, and allow housing that is suitable for families with children.

Today in Arlington, multi-family housing (3+ homes) requires a Special Permit. The districts that allow multi-family housing are located in pockets, mostly in the places where multi-family housing existed in 1975. Much of our current zoning dates to a major rewrite of our master plan, zoning map and zoning bylaw completed in 1975, which followed a moratorium on the construction of apartment buildings. Other cities and towns around Boston enacted similar restrictions during this period. With the notable exception of allowing mixed-use in the B1-B5 districts in 2016, the 1975 limits and requirements placed on the creation of multi-family housing in Arlington remain largely in place today.

Arlington's Fair Housing Action Plan¹, adopted in July 2021, notes that our current zoning bylaw is "in many areas, more restrictive than Arlington's historic development patterns" and the action plan includes recommendations to "allow three-family, townhouse, and multi-family housing options by right in districts nominally meant for them" and to "amend restrictive

More housing in a variety of sizes benefits:

- seniors having trouble finding appropriate housing to downsize into
- municipal workers who want to live in the community they serve
- young adults who grew up in Arlington but can't afford to return
- young families just starting out, and
- people who need housing with accessibility features

¹ <https://www.arlingtonma.gov/home/showpublisheddocument/57214/637620332766000000>

dimensional and parking requirements for multi-family uses that make development infeasible in districts where those uses are appropriate.”

The 2022 Town of Arlington Equity Audit included 12 recommendations, one of which was related to zoning. It recommends that Arlington “address restrictive policies for residential zoning districts in order to allow for desegregation.” The equity audit specifies three strategies for doing so: removing the requirement for a special permit to develop multi-family housing; allowing the development of multi-family housing in the R0 and R1 zones; and allowing for an inclusionary zoning bonus in high-density residential zoning districts.

The Working Group has heard from community members who would benefit from a wider variety in our housing stock. They included: seniors having trouble finding appropriate housing to downsize into; municipal workers who want to live in the community they serve; young families just starting out; people who need housing with accessibility features; and young adults who grew up in Arlington but can’t afford to return. Encouraging more housing in a variety of sizes and price points gives more options to these groups who are so vital to the fabric of our community.

Adopting an MBTA Communities Overlay allows Arlington to:

- make progress implementing Arlington’s Community Equity Audit, Master Plan, Fair Housing Action Plan, Housing Production Plan, Sustainable Transportation Plan, and Net Zero Action Plan,
- remain eligible for millions of dollars in MassWorks infrastructure funding,
- participate in the state’s Fossil Fuel Free Demonstration Program,
- remain eligible for a number of other State grant programs

While the Town of Arlington, an “adjacent” community, is not compelled to comply with MBTA Communities Zoning until the end of 2024, Town Meeting has indicated its eagerness to participate in another state-supported program, the Fossil Fuel Free Demonstration Project. MBTA Communities zoning must be adopted, and the proposed district determined to be “compliant” per the terms of EOHLC by the end of 2023 for the Town to participate in the Fossil Fuel Demonstration Program.

In November 2022, the Arlington Redevelopment Board (ARB) voted to establish a working group to determine the location of Arlington’s MBTA Communities zoning district via rigorous community outreach, stakeholder engagement, and iterative mapping. While the Town is compelled to comply with the state law, or risk running afoul of Federal Fair Housing and Massachusetts anti-discrimination laws, establishment of new housing districts and development of new housing is supported in several of Arlington’s planning documents including: the Master Plan (2015), the Fair Housing Plan (2021), the Net Zero Action Plan (2021), the Community Equity Audit (2023), and the Housing Production Plan (2022). Since last January, the Working Group has met regularly to strategize outreach to community members and develop Arlington’s MBTA

Communities district iteratively and in response to public comments collected via survey, in stakeholder meetings, at community wide public meetings, and via engagement opportunities such as at the Arlington Farmer's Market, Arlington EATS and the Senior Center.

Using public comments, stakeholder outreach, and in consultation with Utile, an urban design firm, the Working Group developed our proposal and recommendations based on the following principles:

Guiding Principles

- Encourage more housing in a variety of sizes and price points,
- Encourage housing located near public transit,
- Encourage housing to provide a customer base in support of local businesses,
- Encourage multi-family housing spread across Arlington, and
- Ensure compliance with MGL c. 40A § 3A (The MBTA Communities Act)

The proposal follows our highest frequency bus lines from Arlington Heights to East Arlington, allowing by-right construction up to four stories along the Massachusetts Avenue and Broadway corridors. The proposal avoids our flood plains and historic districts. And the proposal is in proximity to, but not in, our existing commercial areas. This provides customers in proximity to our business districts, but leaves rezoning of these areas to separate study in the future.

The properties included in the proposed map can be described in three subdistricts:

1. Mass Ave: properties with frontage on Mass Ave
2. Broadway: properties with frontage on Broadway
3. Neighborhood: properties without frontage on Mass Ave or Broadway

Each of these subdistricts has distinct setback requirements and height limits. In the neighborhood subdistrict, the side setbacks are larger, and the height limit is lower. The Working Group chose to allow by-right residential to be 4 stories tall in all subdistricts because buildings that are 4 stories or taller will have an elevator and meet other accessibility requirements. We have heard from many community members that a lack of housing with elevators and other accessibility features is a barrier to residents with different abilities finding housing, and a barrier for seniors looking to downsize and stay in Arlington. The full details of these dimensional controls can be found in the "MBTA Communities Proposal" section of this report.

The stated purpose of Section 3A is to encourage the production of multi-family housing; the law limits the ability of communities to impose other restrictions that might (intentionally or not) defeat the primary purpose of the law. However, the Working Group also heard strongly from the community that the plan needed to do more to respond to Arlington's needs and values that we address with incentive programs.

Incentive Programs

The proposal includes incentive programs that:

- Preserve commercial uses and encourage new mixed-use buildings
- Respond to the need for affordable housing
- Encourage high-quality open space

In response to these needs and values, the Working Group and the Department of Planning and Community Development have developed a set of incentives. These allow for additional stories (one on Broadway, up to two on Mass. Ave) or reduced setbacks for buildings that meet certain criteria. These incentives do not apply to the Neighborhood Multi-Family District.

For parcels directly abutting Mass. Ave and Broadway, the proposal includes a height and setback bonus for providing commercial space on the ground floor. Buildings that meet this requirement may do one or both of the following:

1. Come up to the front lot line. This is in keeping with the current zoning requirements for commercial and mixed-use buildings in Business Zones (except B1). Moreover, it is simply good urban design: shops and restaurants that come up to the sidewalk provide an interesting pedestrian experience and discourage parking in the front yard.
2. Add additional stories: one on Broadway, up to two on Mass. Ave., to encourage the creation of new commercial spaces that would not otherwise be financially feasible.

The proposal includes a height bonus for providing additional affordable units, up to one story along Broadway and 2 stories along Mass. Ave. One additional story raises the affordable housing requirement by 7.5%, to 22.5% of units. A second additional story (on Mass. Ave. only) raises the affordable housing requirement by another 2.5% to 25%.

The Department of Planning and Community Development explored various options to incentivize enhanced open spaces and found the SITES rating system by the Sustainable SITES Initiative to be the best framework to apply in the context of an MBTA Communities. The proposed bonus is of one additional floor for a Gold-level certifiable development on the SITES scale.

More detail and discussion of each of these programs can be found in the “Incentive Programs” section of this report.

Over the next fifty years the proposal by the Working Group to the ARB will result in new multifamily housing that is available, achievable, and affordable and progresses goals shared by the community: to be welcoming and inclusive, to be climate leaders, to give access to Arlington’s open spaces, and to support vibrant businesses.

What is Section 3A (MBTA Communities Legislation)

The multi-family housing requirements for MBTA Communities come from Massachusetts General Law Chapter 40A Section 3A ("Section 3A"), which was enacted in 2021. The law requires each of the 177 MBTA Communities (as defined in General Law 161A, Section 1) to provide at least one zoning district where multi-family housing (three or more dwellings) is allowed by right. The zoning must allow at least 15 dwelling units per gross acre, not be age restricted, and allow housing that is suitable for families with children.

The law was created because the greater Boston region, for some time now, has been in a housing cost spiral, brought on by a lack of housing production that does not meet the growth in jobs and population. The State's Future of Work study estimated a shortage of up to 200,000 housing units. Municipalities play a key role through zoning and permitting in determining whether housing is built. To begin addressing the housing crisis, the law requires communities to amend their zoning and permitting process to encourage greater housing production. Additionally, the State notes that:

- Before COVID-19, Massachusetts faced a core challenge in creating enough housing to support young families, workers, and an aging population. The pandemic has further highlighted these needs.
- Massachusetts has among the highest, and fastest growing, home prices and rents of any state in the nation.
- Rising costs have dramatically increased financial pressures on low- and middle-income families, forcing them to sacrifice other priorities to pay housing costs. High housing costs are a primary driver of homelessness.
- The lack of housing production is an impediment to community development.
- These high costs are a disadvantage as we compete economically against peer states. The risk of future job growth moving outside Massachusetts is rising due to the high costs of living.²

Every community in Massachusetts is responsible for addressing this problem. The law ensures that we, along with 176 other communities, are working to address it together.

Key Requirements:

All 177 MBTA Communities must provide at least one zoning district where:

- multi-family housing (three or more dwellings) is allowed by right,
- housing is permitted with at least 15 dwelling units per gross acre,
- housing cannot be age restricted, and
- the district allows housing that's suitable for families with children.

² <https://www.mass.gov/doc/mbta-communities-summary-deck-feb-2022/download>

In August 2022 the Massachusetts Department of Housing and Community Development (now known as the Executive Office of Housing and Livable Communities, or EOHL) released their final guidance governing Section 3A, which contained specific requirements for each of the 177 MBTA Communities in Massachusetts, including Arlington.³ The Arlington-specific minimum requirements are:

- a minimum district capacity of 2,046 dwelling units (see "Key Concepts" to learn more),
- a minimum district size of 32 acres, and
- no constraints that the district (or districts) be located a certain distance from transit stations.

The guidelines are based on *capacity, not housing to be created in addition to what currently exists*. The minimum capacity of 2,046 units is measured as if there were nothing currently on the land within the zoning district. While the intent of the law was to have districts located near transit, Arlington has little developable land in the vicinity of the Alewife T station, and the governing regulations take this fact into consideration.

In August 2023, EOHL released additional revisions to their guidance to allow a mixed-use district to count for a portion of compliance with Section 3A. The Working Group reviewed these updated guidelines and concluded that it did not make sense in the areas that were chosen for the proposed multi-family districts. The Working Group felt that its incentive-based approach – whose 60% requirement for ground-floor commercial floor area is double the threshold allowed by the State guidelines – would lead to more and higher-quality commercial spaces.

Compliance Ensures:

- progress implementing Arlington's DEI Audit, Master Plan, Fair Housing Action Plan, Housing Production Plan, Sustainable Transportation Plan, and Net Zero Action Plan,
- eligibility for millions of dollars in MassWorks infrastructure funding,
- participation in the state's Fossil Fuel Free Demonstration Program,
- eligibility for a number of other State grant programs, and

What does this mean for Arlington?

Implementing a meaningful MBTA Communities zoning district will allow Arlington to make progress on recommendations in our recent Community Equity Audit, as well as the **Master Plan, Fair Housing Action Plan, Housing Production Plan, Sustainable Transportation Plan, and Net Zero Action Plan**. Compliance ensures Arlington's eligibility for millions of dollars in infrastructure funding from the State's MassWorks program.

³ <https://www.mass.gov/info-details/multi-family-zoning-requirement-for-mbta-communities>

The Attorney General issued an advisory concerning enforcement of the law in March 2023; “opting out” is not an option.⁴ Both the Select Board and the Arlington Redevelopment Board (ARB) have indicated that the Town should work to achieve compliance with the law.

In August 2023, EOHLCL listed an additional thirteen grant programs that will take compliance with MBTA Communities into consideration. These include the Executive Office of Energy & Environmental Affairs (EOEEA) Municipal Vulnerability Preparedness (MVP) Planning and Project Grants and the EOHLCL Community Planning Grant, through which the Town has secured and hopes to continue securing tens of thousands of dollars for climate resilience, housing, and economic development initiatives. Having a compliant MBTA Communities district is also a requirement for participation in the state’s Fossil Fuel Free Demonstration Program. In 2020 92% of Town Meeting voted to approve a fossil-fuel free, or “clean heat,” bylaw and Home Rule Petition requesting local authority to prevent the installation of fossil fuel infrastructure in new construction and major renovations. In 2021, Arlington became the first community in the state to file a Home Rule Petition for this purpose. That Home Rule Petition was not approved. Instead the State Legislature authorized the creation of a Fossil Fuel Free Demonstration Program. Arlington is first on the list of ten communities prioritized for participation in the pilot. If we do not have an approved MBTA Communities District by early 2024, Arlington will forfeit its place in the Program to another community; there is currently not opportunity to enter this program later. Arlington is a leader on climate action and would be an ideal pilot community to develop and scale this program. Furthermore, participating ensures that the Town carries out the will of Town Meeting and stays on track to meet its goals of achieving net zero greenhouse gas emissions by 2050.

⁴Andrea Joy Campbell, Massachusetts Attorney General; Advisory Concerning Enforcement of the MBTA Communities Zoning Act:

<https://www.arlingtonma.gov/home/showpublisheddocument/64380/638144981082117352>

The MBTA Communities Working Group

The Arlington Redevelopment Board (ARB) voted to create an MBTA Communities Working Group on November 7, 2022. The Working Group was created to work with the Department of Planning and Community Development to understand town priorities for implementing the law and to develop a proposal for a Town Meeting in Fall of 2023.

Arlington's Department of Planning and Community Development held an initial public forum in November 2022, and solicited interest in the Working Group following that initial forum. Seven community members, plus two members of the ARB, began meeting as the MBTA Communities Working Group on February 2nd, 2023. The charge of the Working Group was to craft a proposal for by-right multi-family housing in Arlington to be considered by the ARB and Town Meeting, using the community's expressed values and goals.

The members of the Working Group are:

- Kin Lau, ARB Representative
- Stephen Revilak, ARB Representative
- Ramie Schneider, Resident
- Mette Aamodt, Resident
- Shaina Korman-Houston, Resident
- Sanjay Newton, Resident
- Laura Wiener, Resident
- Vincent Baudoin, Resident
- Rebecca Gruber, Resident

The Working Group worked in conjunction with staff from the Department of Planning and Community Development and the Diversity, Equity, and Inclusion Division.

The size of the undertaking, and the schedule to do so, were formidable. The Working Group met four times in February and March and 15 times – nearly every week – from the first week of May through the first week of September. All the Working Group's meetings were open to the public and attracted a number of attendees from the community.

The Working Group also held three larger public forums designed to solicit public input. The first, in March, was held on Zoom and was an introduction to our Community Visioning Survey. The second, on June 8th, was held in person at the Community Center, where participants held table discussions about an early concept map. The third, in July, featured a panel who answered questions from the public. The Working Group also conducted a thorough outreach plan to both educate and listen to the community in a number of ways. This work is outlined in the next section of the report.

Outreach and Public Engagement

From the very beginning of Arlington's response to the MBTA Communities Act, outreach has been a primary and essential component of the Town's effort. Starting with the first Town-wide meeting on November 17, 2022 and the call for community members to volunteer to serve on the MBTA Communities Working Group and continuing through the delivery of the Working Group's final report to the Redevelopment Board and the on-going delivery of education and information sharing to the community and Town Meeting Members in advance of the Special Town Meeting opening on October 17, 2023.

There is a wide and growing body of research showing that not all voices in a community are equally likely to be represented at a traditional public meeting. Hearing from, and speaking to, the community requires multiple forms of engagement, because different community members can be found in different places and prefer to engage in different ways. The Working Group has taken this knowledge seriously, and was fortunate to partner with Teresa Marzilli, the Town's Community Outreach and Engagement Coordinator, who works in the Diversity, Equity & Inclusion Division. Mx. Marzilli's expertise helped the Working Group craft and execute an extensive outreach plan.

Here is a list of some of the highlights of the outreach efforts (video recording of events and supporting slide decks as well as comprehensive survey reports can be found on the MBTA Communities page of the Town's website):

- Arlington and MBTA Communities Zoning Virtual Public Meeting (November 17, 2022)
- Multi-family Housing in Arlington: A Community Visioning Session regarding MBTA Communities Virtual Public Meeting (March 9, 2023)
- Community Survey, over 1,000 responses received. (March - April, 2023)

The survey listed thirteen general strategies, and residents were asked whether they felt each strategy was important to include, important but secondary to other options, whether they felt neutral, or whether they opposed. Along with these rating questions, respondents were given the opportunity to provide detailed comments and feedback. This public feedback helped shape the first iteration of district maps, along with noting topics for further consideration.

- MBTA Communities Public Meeting and Presentation of Draft Map (June 8, 2023)

The meeting was attended by more than 125 residents in-person. It was also live streamed by ACMi. Participants worked in small groups and provided valuable additional input in the iteration of the draft map as well as guidance for the overlay zone's dimensional requirements and priorities for bonus incentives.

- Community Survey and Meeting in a Box sessions (June - July, 2023)

Asking the same questions as the June 8th public meeting, a survey and a meeting in a box were made available to the community to broaden the diversity of voices heard.

- MBTA Communities Working Group Public Meeting (July 25, 2023)

After presenting the latest version of the draft overlay district map and proposed dimensional requirements, the Working Group heard comments from over sixty community members, who provided feedback and input for the creation of the Working Group's final recommendations to the Arlington Redevelopment Board. The event was also live streamed by ACMi.

- “Office Hours” at Robbins Library (July-August 2023)
- Information table in the foyer of Robbins Library (July 2023)
- “Pop-Ups” at The Arlington Farmers Market, Arlington Eats, and the Senior Center. (July-August 2023)
- Town-wide mailing to all Arlington residents to raise awareness about the Town’s response to the requirements of the MBTA Communities Act and to encourage community members to join the conversation. (August 2023).
- Presentations and conversations with many community groups, Town departments, and Town boards and committees, including the Chamber of Commerce, the Housing Corporation of Arlington, the Historic Districts Commission, the Affordable Housing Trust Board, the Open Space Committee, the School Department, and the Town’s DEI commissions. (July, 2023 - Present)
- The Working Group will continue to make members available to speak and answer questions at upcoming Precinct Meetings and other events in the lead up to Town Meeting. (Present through Town Meeting)

Community Visioning Survey

The MBTA Communities Working Group and the Department of Planning and Community Development created a survey to gather public input on how Arlington should go about meeting the requirements of the new law. The survey listed thirteen general strategies. Residents were asked whether they felt each strategy was important to include, important but secondary to other options, whether they felt neutral, or whether they opposed. Residents were not asked to prioritize among the strategies. Along with these rating questions, respondents were given the opportunity to provide detailed comments and feedback. The survey was the subject of a well-attended public meeting, publicized on the Town website, in Town email notices, and on the Town's social media. During the months of March and April 2023, 1,033 people responded to the survey, including 2,325 comments from 506 distinct respondents. This public feedback⁵ helped shape the first iteration of district maps, along with noting topics for consideration as we moved through the process.

Community Visioning Survey

Residents were asked whether they felt each of 13 general strategies was important to include, important but secondary to other options, whether they felt neutral, or whether they opposed. Residents were not asked to prioritize among the strategies.

Along with these rating questions, respondents were given the opportunity to provide detailed comments and feedback.

There are several ways to look at the results of the survey's multi-choice questions, and this section will provide three. The first is to look at the strategies that respondents felt were *important* to include. These are:

% Important	Strategy
64.74%	Integrating sustainable principles
62.29%	Encouraging multi-family housing that includes affordable units
59.88%	Encouraging multi-family housing near public transit
59.24%	Promoting development and vitality of commercial centers
56.91%	Providing access to shared community spaces
52.45%	Avoiding flood-prone areas
50.84%	Encouraging multi-family housing in walkable and bikeable locations
45.45%	Encouraging multi-family housing that includes mixed uses
39.48%	Encouraging multi-family housing near commercial corridors
37.45%	Encouraging multi-family housing in all neighborhoods
36.46%	Encouraging multi-family housing along commercial corridors
35.12%	Encouraging multi-family housing in commercial centers
24.13%	Encouraging multi-family housing on existing large parcels

⁵ <https://www.arlingtonma.gov/home/showpublisheddocument/65987/638236619962500000>

A second way is to view the strategies with *support* (i.e., where the respondent answered "important", or "important but secondary to other goals"). These are:

% Support	Strategy
87.11%	Integrating sustainable principles
82.23%	Promoting development and vitality of commercial centers
79.79%	Providing access to shared community spaces
76.85%	Encouraging multi-family housing that includes affordable units
76.44%	Encouraging multi-family housing near public transit
72.95%	Encouraging multi-family housing in walkable and bikeable locations
71.34%	Encouraging multi-family housing that includes mixed uses
67.67%	Avoiding flood-prone areas
62.51%	Encouraging multi-family housing near commercial corridors
60.27%	Encouraging multi-family housing in commercial centers
59.85%	Encouraging multi-family housing along commercial corridors
55.17%	Encouraging multi-family housing in all neighborhoods
46.47%	Encouraging multi-family housing on existing large parcels

A third way is to view the strategies according to what was *acceptable* (i.e, where the respondent answered "important", "important, but secondary to other goals", or "neutral").

These are:

% Acceptable	Strategy
94.43%	Integrating sustainable principles
92.40%	Promoting development and vitality of commercial centers
90.10%	Providing access to shared community spaces
89.25%	Encouraging multi-family housing that includes mixed uses
85.34%	Encouraging multi-family housing that includes affordable units
84.62%	Encouraging multi-family housing near public transit
84.62%	Encouraging multi-family housing along commercial corridors
84.36%	Avoiding flood-prone areas
84.11%	Encouraging multi-family housing in walkable and bikeable locations
82.72%	Encouraging multi-family housing near commercial corridors
82.60%	Encouraging multi-family housing in commercial centers
75.24%	Encouraging multi-family housing on existing large parcels
69.41%	Encouraging multi-family housing in all neighborhoods

Sustainability

No matter which lens one uses to view the results, there is a clear preference for integrating sustainable principles in planning for new multi-family housing. Sustainable principles can be applied at all scales of planning and development. Sustainable development meets our current needs while protecting our planet for future generations by balancing economic development, social equity and environmental protection. Many of the questions in the survey addressed sustainable development more specifically, like housing near public transit, walkable and bikeable locations and avoiding flood-prone areas. The survey results show that all of these are

widely supported in Arlington. Related to sustainable development is the concept of “Smart Growth” that encourages compact, transit-oriented, walkable and bikeable communities including neighborhood schools, complete streets, and mixed-use development with a range of housing types. Smart Growth embodies Arlington’s goals and values and is a framework that can be used to plan future development. The Town’s Net Zero Action Plan,⁶ adopted in 2021, directly connects sustainability and MBTA Communities by explicitly prioritizing higher density, transit oriented housing. Finally, the responses support the idea that participation in the state’s Fossil Fuel Free Demonstration Program is a community priority.

Commercial Vitality

The general goal of promoting the development and vitality of Arlington's commercial centers gathered high support. There are a number of ways this can be done particularly with a “Smart Growth” mindset. A subset of questions like (a) encouraging multi-family housing in commercial centers, (b) encouraging multi-family housing along commercial corridors, (c) encouraging multi-family housing near commercial corridors, and (d) encouraging multi-family housing that includes mixed-use drew the support of approximately 60% or more of respondents. The rationale of these strategies is to locate multi-family housing where it can provide more customers, foot traffic, and patronage to Arlington's restaurants, shops, and services. Our consultants from Utile provided the following as a rough guideline: it generally takes one household to support 30 square feet of retail space. This equates to needing 100 households to support a 3000 square foot store. Allowing more residents to live within walking distance of our businesses creates the potential for more commercial vitality.

Affordable Housing

A number of survey respondents expressed a desire to see multi-family housing with a larger percentage of affordable (i.e., subsidized) dwellings, or affordable dwellings priced for lower income households. However, Section 3A's multi-family requirements only provides a limited opportunity to do so. Any community that wishes to implement more than a 10% affordability requirement must provide an economic feasibility analysis showing that a variety of multi-family housing types can be feasibly developed under the requirements it proposes. Arlington currently requires 15% (one in six) affordable units in developments of six dwelling units or more, priced for 60% of the area median income. The Department of Planning and Community Development has contracted for the necessary feasibility analysis showing that our current 15% rate is economically viable, and we expect that our 15% inclusionary zone will be acceptable to the State.

⁶ <https://www.arlingtonma.gov/home/showpublisheddocument/55139/637885684739670000>

Multi-family Zoning in Arlington Today

Today in Arlington, multi-family housing (3+ homes) requires a Special Permit. The districts that allow multi-family housing are located in pockets, mostly in the places where multi-family housing existed in 1975. Much of our current zoning dates to a major rewrite of our master plan, zoning map and zoning bylaw completed in 1975. The changes to the bylaw made in 1975 required a Special Permit for all multi-family housing and generally increased minimum lot sizes, reduced maximum heights, and increased parking requirements for multi-family housing. These changes to Arlington's zoning followed a moratorium on the construction of apartment buildings and were designed to limit multi-family housing development in Arlington. Other cities and towns around Boston enacted similar restrictions during this period. With the notable exception of allowing mixed-use in the B1-B5 districts in 2016, the 1975 limits and requirements placed on the creation of multi-family housing in Arlington remain largely in place today.

Arlington's Fair Housing Action Plan, adopted in 2021:

"As segregation in greater Boston was challenged and integration became a real prospect across the region, Arlington's attitude toward development shifted. **Concerted opposition to development projects began in the 1960s and became more organized in the early 1970s.** Activists used both explicit and coded anti-integration language to rally opposition to **apartment development** and the related effort to downzone portions of the Town. In 1975, following a one-year moratorium on multi-family construction, Town Meeting adopted a new, more complex Zoning Bylaw that created multiple new permitting processes for most forms of development and "downzoned" most of the town through restrictions on density, height, lot size, and parking. **The ability to develop any type of residential use except higher-cost, single-family housing was severely curtailed.** In 1991, Town Meeting adopted an amendment creating the RO district, which extended this logic to require even larger lots of new single-family homes in some parts of town.

Guiding Principles

The Working Group has created a proposed overlay zoning district that allows by-right multi-family zoning. The proposal also includes incentive programs to encourage builders to include ground floor commercial, additional affordable housing, or upgraded outdoor spaces along the main corridors. The proposal is guided by the principles identified through community and stakeholder input, existing planning documents and the intent of the law:

- Encourage more housing in a variety of sizes and price points,
- Encourage housing located near public transit,
- Encourage housing to provide a customer base in support of local businesses,
- Encourage multi-family housing spread across Arlington, and
- Ensure compliance with MGL c. 40A § 3A (The MBTA Communities Act)

Encourage more housing in a variety of sizes and price points

Arlington and the greater Boston region need more housing in a variety of sizes and at a variety of price points. Our region is experiencing a well-documented housing crisis because we have not built enough new homes to keep up with economic and population growth in recent decades. Massachusetts has among the highest, and fastest growing, home prices and rents of any state in the nation, and Arlington is part of this trend. The State's Future of Work study estimated a shortage of up to 200,000 homes.

Arlington's Fair Housing Action Plan⁷, adopted in July 2021, notes that our current zoning bylaw is "in many areas, more restrictive than Arlington's historic development patterns" and the action plan

includes recommendations to "allow three-family, townhouse, and multi-family housing options by right in districts nominally meant for them" and to "amend restrictive dimensional and parking requirements for multi-family uses that make development infeasible in districts where those uses are appropriate."

The 2022 Town of Arlington Equity Audit included 12 recommendations, one of which was related to zoning. It recommends that Arlington "address restrictive policies for residential zoning districts in order to allow for desegregation." The equity audit specifies three strategies for doing so: removing the requirement for a special permit to develop multi-family housing;

More housing in a variety of sizes benefits:

- seniors having trouble finding appropriate housing to downsize into
- municipal workers who want to live in the community they serve
- young adults who grew up in Arlington but can't afford to return
- young families just starting out, and
- people who need housing with accessibility features

⁷ <https://www.arlingtonma.gov/home/showpublisheddocument/57214/637620332766000000>

allowing the development of multi-family housing in the R0 and R1 zones; and allowing for an inclusionary zoning bonus in high-density residential zoning districts.

The Working Group has heard from community members who would benefit from a wider variety in our housing stock. Including seniors having trouble finding appropriate housing to downsize into; municipal workers who want to live in the community they serve; young families just starting out; people who need housing with accessibility features; and young adults who grew up in Arlington but can't afford to return. Encouraging more housing in a variety of sizes and price points gives more options to these groups who are so vital to the fabric of our community.

More housing over time

The Working Group has chosen to create a proposal that over time will result in new multi-family housing and helps us make progress on the goals we share as a community: to be welcoming and inclusive, to be climate leaders, to give access to our open spaces, and to support vibrant businesses.

The Working Group also heard from some community members who have encouraged us to create a plan with the explicit goal of bare minimum compliance, suggesting that more multi-family housing would not benefit our community. Many of these bare minimum plans would zone no additional housing, and some would even zone for less housing than currently exists.

The Working Group has chosen to create a proposal that over time will result in new multi-family housing and helps us make progress on the goals we share as a community: to be welcoming and inclusive, to be climate leaders, to give access to our open spaces, and to support vibrant businesses. In contrast, a proposal designed to do the bare minimum will not encourage much, if any, new housing. It might allow us to meet the letter of the law, but it will not help us make progress on the goals that we share as a community.

Encourage housing located near public transit

Under Section 3A guidelines, Arlington has the flexibility to locate our districts anywhere in town. However, locating housing near transportation is an explicit goal of the legislation and existing Town plans. This strategy was also highly valued by participants in our April survey. Arlington residents drive fewer miles per day than many other residents of the Commonwealth⁸. Locating housing near transit offers additional climate benefits by making it more convenient for residents to

Encourage housing located near public transit

Arlington residents drive fewer miles per day than many other residents of the Commonwealth. Locating housing near transit offers additional climate benefits by making it more convenient for residents to access their daily needs without using a car, further reducing our dependence on single occupancy vehicles.

⁸ <https://geodot-homepage-massdot.hub.arcgis.com/pages/massvehiclecensus>

access their daily needs without using a car, further reducing our dependence on single occupancy vehicles.

The Town's Net Zero Action Plan⁹ and the Connect Arlington Sustainable Transportation Plan¹⁰, both adopted in 2021, include recommendations to "continue to encourage and incentivize mixed-use, higher density development near transit and jobs" because "people who live or work in or adjacent to mixed-use environments, and especially those served by transit, often drive less because it is more convenient to walk or bike to eat, shop, or hop on a public transit option." The Sustainable Transportation Plan also recommends reduced parking minimums and consideration of parking maximums.

Arlington has access to transit through the Red Line at Alewife and via our bus lines, especially the 77. The Working Group received suggestions and considered locations near almost all transit routes including Park Ave, Pleasant St, Summer St, Mystic Street, along the Route 2 Access Rd, along the Minuteman Bikeway, and near Alewife. Ultimately the Working Group decided to focus on Mass Ave and Broadway because of a desire to avoid areas within the floodplain, to spread the district to more parts of town, and to locate housing near our existing commercial areas. The Working Group shares the community's concerns about the current state of the MBTA, but is also encouraged that the 77 is proposed to be part of the "High Frequency Network" as the MBTA works to hire more drivers and implement their bus network redesign.

Recommended in the Net Zero Action Plan

The Town's Net Zero Action Plan and the Connect Arlington Sustainable Transportation Plan include recommendations to "continue to encourage and incentivize mixed-use, higher density development near transit and jobs" because "people who live or work in or adjacent to mixed-use environments, and especially those served by transit, often drive less because it is more convenient to walk or bike to eat, shop, or hop on a public transit option."

Encourage housing to provide a customer base in support of local businesses

The general goal of promoting the development and vitality of Arlington's commercial centers gathered high support in our April survey. There are a number of ways this can be done particularly with a "smart growth" mindset. The rationale of this strategy is to locate multi-family housing where it can provide more customers, foot traffic and patronage to Arlington's restaurants, shops, and services. Our consultants from Utile provided the following as a

Support local businesses

Allowing more residents to live within walking distance of our businesses creates the potential for more commercial vitality by providing more customers, foot traffic, and patronage to Arlington's restaurants, shops, and services.

⁹ <https://www.arlingtonma.gov/home/showpublisheddocument/55139/637885684739670000>

¹⁰ <https://www.arlingtonma.gov/home/showpublisheddocument/56982/637641174457130000>

rough rule of thumb: it generally takes one household to support 30 square feet of retail space. This equates to needing 100 households to support a 3000 square foot store.

Allowing more residents to live within walking distance of our businesses creates the potential for more commercial vitality. The Working Group received clear guidance from the ARB to avoid existing industrial and commercially zoned properties as part of our proposal, and we have done so, focusing our proposal on the areas in proximity to, but not in, our major commercial centers of Capitol Square, Arlington Center, and Arlington Heights.

Encourage multi-family housing spread across Arlington

Under the Section 3A guidelines, Arlington has the flexibility to locate our districts anywhere in town. In fact, the Working Group received suggestions and considered locations in almost all areas of town including Park Ave, Pleasant St, Summer St, Mystic Street, along the Route 2 Access Rd, along the Minuteman Bikeway, and near Alewife. The Working Group heard from both community members and the school department that it was important not to cluster a district in the catchment area for a small number of elementary schools. The proposal from the Working Group is spread across all the current catchment areas for the elementary schools and gives the school department flexibility to continue to use buffer zones to manage any future changes in enrollment.

Ensure compliance with MGL c. 40A § 3A (The MBTA Communities Act)

The proposal was developed with the support of the professional staff in the Department of Planning and Community Development and our consultant Utile. The proposed map and zoning language have been submitted to the Executive Office of Housing and Livable Communities (EOHLC) for pre-adoption review, which we expect to have back before Town Meeting discusses the proposal.

The guidelines from the Executive Office of Housing and Livable Communities (EOHLC) are extensive¹¹ and were revised by the state on August 17th, 2023 as the Working Group was finalizing the proposal. After reviewing the updated guidelines¹², the Working Group believed the new provisions allowing some limited options to require ground floor commercial did not offer an improvement over the current strategies of incentivizing ground-floor commercial and placing the multi-family district outside of areas currently zoned for commercial use.

Pre-adoption review

The proposed map and zoning language have been submitted to the state for pre-adoption review, which we expect to have back before Town Meeting discusses the proposal.

¹¹ <https://www.mass.gov/info-details/section-3a-guidelines>

¹² <https://www.mass.gov/info-details/summary-of-081723-revisions-to-section-3a-guidelines>

MBTA Communities Proposal

As the Working Group was developing the proposal, we considered many locations across Arlington. As you look at the final proposed map, you can see how the guiding principles have shaped the locations that we've chosen. The proposal follows our highest frequency bus lines from Arlington Heights to East Arlington. The proposal avoids our flood plains and historic districts. The proposal is in proximity to, but not in, our existing commercial areas.

The proposed district covers 110 of Arlington's 3,517 acres. In the proposed district there are approximately 2,100 homes existing today. The state's compliance model, which calculates how many homes could exist in the proposed district if somehow every existing home were removed, and if every lot was built to the absolute maximum, and if it was built with no parking, and if every unit was a 1,000 square foot apartment, calculates a 'capacity' of 7,268 units. Please note that capacity is meant to measure 'reasonable size' and not as a calculation of likely future development.

The Working Group has created a proposal that over time will result in new multi-family housing and helps us make progress on the goals we share as a community: to be welcoming and inclusive, to be climate leaders, to give access to our open spaces, and to support vibrant businesses.

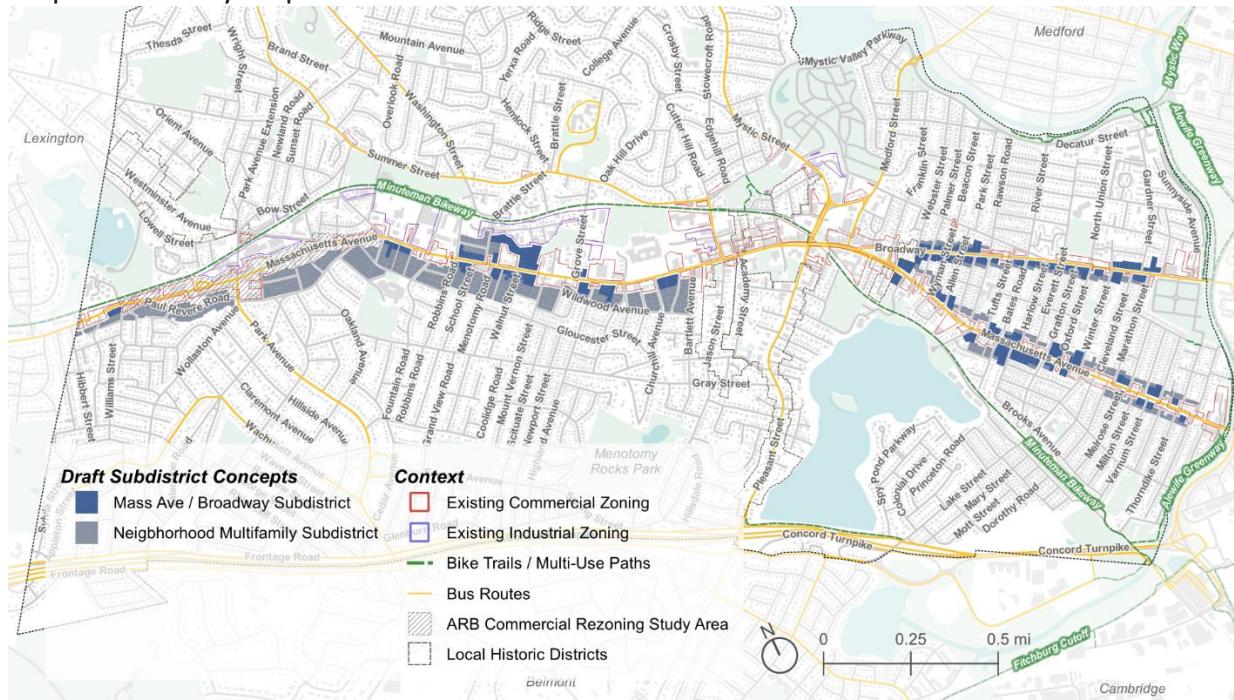
Subdistricts

The properties included in the proposed map can be described in three subdistricts:

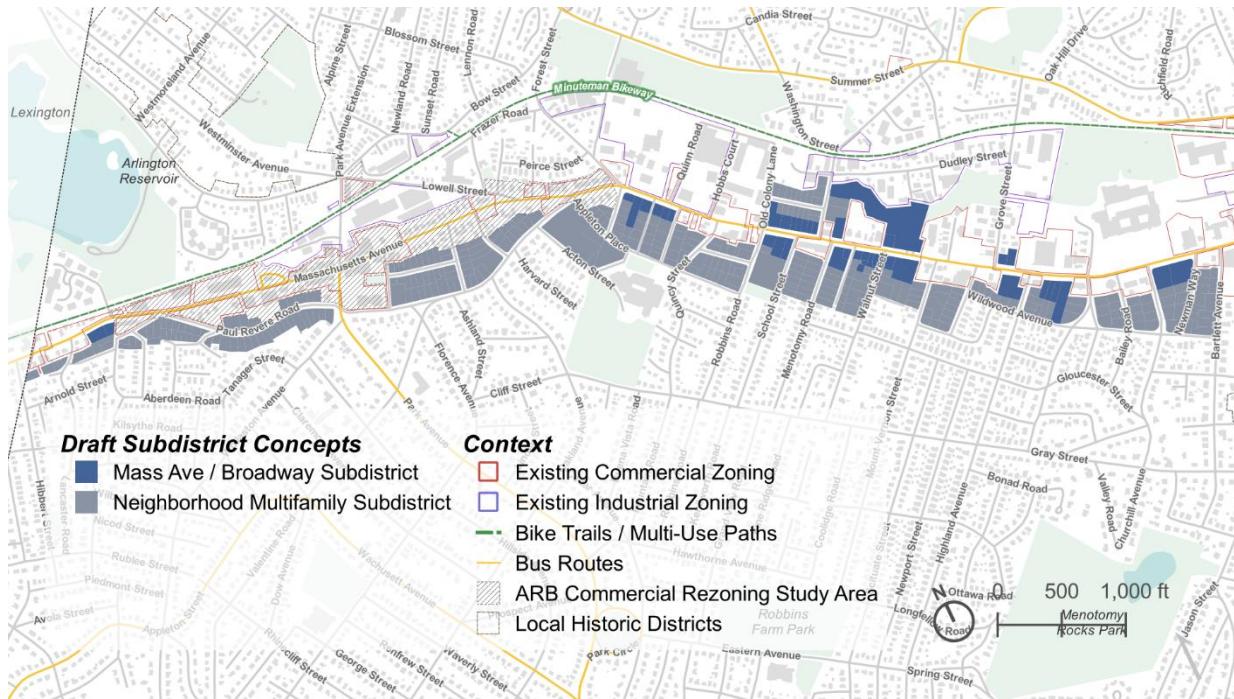
1. Mass Ave: properties with frontage on Mass Ave (shown in blue)
2. Broadway: properties with frontage on Broadway (shown in blue)
3. Neighborhood: properties without frontage on Mass Ave or Broadway (shown in gray)

Each of these subdistricts has distinct setback requirements and height limits. In the neighborhood subdistrict, the side setbacks are larger, and the height limit is lower. The incentive programs for ground floor commercial, increased affordability and better open space usage also apply differently between the districts. The commercial bonus is decreased on Broadway compared with Mass Ave and there are no incentive programs in the neighborhood subdistrict. Following the maps there is a summary table of the various dimensional controls and bonus programs.

Proposed Overlay Map



Full View of Arlington (above)



Detail View of Arlington Heights (above)



Detail View of East Arlington (above)

Full Size Map: <https://www.arlingtonma.gov/home/showpublisheddocument/66583>

Dimensional Regulations

The following table shows the required setbacks and height limits for by-right residential development in each subdistrict:

Dimensional Regulations	Minimum Setback (in feet)			Maximum Height	
	Front	Side	Rear	Stories	Feet
Mass Ave (in blue)	15	5	20	4	52
Broadway (in blue)	15	5	20	4	52
Neighborhood (in gray)	15	10	20	4	46

Buildings that are 4 stories or taller will have an elevator and meet other accessibility requirements¹³. This was a major driver behind the Working Group choosing to allow by-right residential to be 4 stories tall in all subdistricts. We have heard from many community members that a lack of housing with elevators and other accessibility features is a barrier to residents with different abilities finding housing, and a barrier for seniors looking to downsize and stay in Arlington.

¹³ An earlier version of this report stated that the building code requires an elevator at 4 stories. This was too simplified an explanation of the elevator requirements. In practice, 4 story buildings will have elevators.

Parking

The proposal includes a parking maximum of 1 space per unit, with no minimum parking requirement. The parking recommendations in the proposal align directly with strategies from Arlington's Net Zero Action Plan and the Connect Arlington Sustainable Transportation Plan.

Strategy F.1.2.2 from the Connect

Arlington Sustainable Transportation Plan¹⁴, adopted in 2021, notes "parking maximums typically work best in mixed-use areas proximate to essential goods and services—such as grocery stores—and frequent transit service or alternative transportation options. In Arlington, this would include all of Mass Ave and Broadway."

Connect Arlington Sustainable Transportation Plan

"Parking maximums typically work best in mixed-use areas proximate to essential goods and services—such as grocery stores—and frequent transit service or alternative transportation options. In Arlington, this would include all of Mass Ave and Broadway."

The Perfect Fit Parking Study¹⁵ from the Metropolitan Area Planning Council gathered data about actual parking usage at multi-family buildings. Their data show peak parking demand below 1 space per unit across all of the Arlington properties surveyed.

The Arlington Net Zero Action Plan lists "successful adoption of reduced parking requirements" as the measure of success for Priority Action ZEM 6.¹⁶

Land required for parking drives up the price of housing, contributes to heat islands, and encourages the use of automobiles. By capping the amount of parking and allowing the future possibility of little or no parking we reduce housing costs, encourage more sustainable transportation, and reduce heat island effects.

¹⁴ <https://www.arlingtonma.gov/home/showpublisheddocument/56982/637641174457130000>

¹⁵ <https://perfectfitparking.mapc.org/>

¹⁶ <https://www.arlingtonma.gov/home/showpublisheddocument?id=55139>

Incentive Programs

The stated purpose of Section 3A is to encourage the production of multi-family housing; the law limits the ability of communities to impose other restrictions that might (intentionally or not) defeat the primary purpose of the law. The proposed multi-family zoning regulations meet this goal by allowing for by-right construction up to 4 stories along the Mass. Ave and Broadway corridors. However, the Working Group also heard strongly from the community that the plan needed to do more to respond to Arlington's needs and values, in three areas in particular:

1. Preserve commercial uses and encourage new mixed-use buildings
2. Respond to the need for affordable housing
3. Encourage high-quality open space

In response to these needs and values, the Working Group and the Department of Planning and Community Development have developed a set of incentives. These allow for additional stories (one on Broadway, up to two on Mass. Ave) for buildings that meet certain criteria, as well as reduced setbacks for mixed-use buildings along Broadway and Mass Ave. These incentives do not apply to the Neighborhood Multi-Family District. The table below summarizes the incentives and following the table is additional information about each incentive program.

<i>Incentives</i>	<i>Mixed-Use</i>	<i>Affordable</i>	<i>SITES</i>	<i>Max Height</i>
<i>Mass Ave</i>	+2 stories	+1 story for 22.5% affordable +2 stories for 25% affordable	+1 story	6 stories
	0 ft front setback			
<i>Broadway</i>	+1 story	+1 story for 22.5% affordable	+1 story	5 stories
	0 ft front setback			
<i>Neighborhood</i>	N/A	N/A	N/A	4 stories

Mixed-Use Incentive

There was substantial support throughout the process for maintaining and even expanding the Town's commercial tax base and services. In response to community concerns about the potential loss of commercial uses, the Working Group did not include any parcels zoned Commercial or Industrial in the new multi-family overlay. The multi-family districts cover only residential-zoned parcels along the Mass. Ave and Broadway corridors, near but not in existing commercial centers. Locating more housing near stores, businesses, and employers is an approach that helps both residents and businesses, placing residents near services, and increasing the customer base for businesses.

For parcels directly abutting Mass. Ave and Broadway, the Working Group felt it would be beneficial to encourage mixed-use buildings with commercial on the first floor and residential above. Examples of this type of development include the Arlington EATS building at 117 Broadway and the 882-889 Mass Ave block. However, the Working Group heard from many parties that property owners generally find commercial space less profitable to build than residential. Therefore, the proposal includes a height and setback bonus for projects that provide commercial space.

Mixed-Use Incentive

In order to qualify for the Mixed-Use Incentive, a project must allocate:

- 60% of the ground floor **area** to commercial, and
- 80% of the ground floor **frontage** to commercial

In return a project may:

- Come to the front lot line
- Add additional stories

To benefit from these bonuses, a project must allocate 60% of the ground floor area to commercial uses and 80% of the ground floor frontage. Buildings that meet this requirement may do one or both of the following:

1. Come up to the front lot line. This is in keeping with the current zoning requirements for commercial and mixed-use buildings in Business Zones (except B1). Moreover, it is simply good urban design: shops and restaurants that come up to the sidewalk provide an interesting pedestrian experience and discourage parking in the front yard. Most of the buildings in Arlington's existing commercial centers (Arlington Center, the Heights Business District, and Capitol Square) follow this pattern.
2. Add additional stories: one on Broadway, up to two on Mass. Ave. The first additional story allows the developer or building owner to provide a commercial space on the ground floor without sacrificing residential space. This will encourage the creation of new commercial spaces that would not otherwise be financially feasible. The second additional story – only available in the Mass Ave portion of the MBMF District – provides an even stronger incentive for the addition of commercial space along Arlington's "Main Street". For any stories above 4 (i.e. stories 5 and 6), the zoning requires a 7.5 foot step-back from the property line at street frontages.

A note regarding incentives vs. mandates: the initial guidelines provided by the State did not allow communities to require mixed-use development in Section 3A multi-family districts. On August 17, 2023 the State updated its guidelines to allow certain mixed-use districts to count towards a portion of the required total unit capacity. The Working Group reviewed these updated guidelines in its August 29th meeting. It concluded that while a requirement for mixed-use might make sense in certain areas, such as Arlington Center, it did not make sense in the areas that were chosen for the proposed multi-family districts, which are all residentially zoned.

The Working Group felt that its incentive-based approach – whose 60% requirement for ground-floor commercial floor area is double the threshold allowed by the State guidelines – would lead to more and higher-quality commercial spaces, without imposing a mandate that might be uneconomic or lead to vacant storefronts. However, the Working Group strongly encourages the Arlington Redevelopment Board to study the possibilities for mixed-use zoning in other areas of Town where a mandate for some commercial space might make sense.

Affordable Incentive

There was strong support on the Working Group for exceeding the Town's Inclusionary Zoning requirement of 15% affordable housing, and we heard similar support in our conversations with the community. Early guidance from EOHLIC indicated communities would have to justify a requirement over 10% for affordable housing to show that it is economically viable and would not inhibit the production of multi-family housing. On July 18, the Working Group requested that the Department of Planning and Community Development submit an economic feasibility analysis to the State to that effect. DPDC has contracted for that economic feasibility analysis and expect easy approval from the State. At a meeting 2 weeks later, the Working Group discussed a proposal to allow additional stories as an incentive for voluntarily providing a higher percentage of affordable units over the 15% currently required.

Affordable Incentive

The proposal requires 15% affordable housing, matching our existing requirements. It includes a height bonus for providing additional affordable units, up to one story along Broadway and 2 stories along Mass. Ave. One additional story raises the affordable housing requirement by 7.5%, to 22.5% of units. A second additional story (on Mass. Ave. only) raises the affordable housing requirement by another 2.5% to 25%.

The Working Group voted to include an affordability height bonus of one story along Broadway and two stories along Mass. Ave. One additional story raises the affordable housing requirement by 7.5%, to 22.5%. A second additional story (on Mass. Ave. only) raises the affordable housing requirement by another 2.5% to 25%. Income and rent or sale price restrictions match those in our existing Inclusionary Zoning regulation. This incentive assumes that the State allows the Town to increase the base inclusionary zoning over 10%. We expect a response from the State before Special Town Meeting.

The 28 incentives are sized based on an analysis of the financial return required to make a project feasible. Generally speaking, the per unit cost to build a 4-story building is greater than for a 5 or 6 story building, because some of the costs are fixed (i.e. land cost) and some may increase, but at a greatly reduced rate (i.e. architectural fees; some construction costs like site work, foundations, elevators, and the roof). Therefore, building higher is a more cost-efficient way to

provide housing.¹⁷ It costs an estimated 20 – 25% to increase the kind of small to moderately-sized building we anticipate would be common in this district from a 4-story building (16 units) to a 6-story building (24 units) – a 33% increase in number of units. This makes each unit marginally less expensive and potentially more profitable. As an example, if it costs \$400,000 per unit to develop 16 units, it might only cost \$325,000 per unit to develop 24 units. We propose that some of those cost savings would make it financially feasible for a developer to provide additional affordable units, with lower rents for income-qualified residents.

The proposal offers a single-story bonus for providing an additional 7.5% affordable units, and a two-story bonus for providing 10% affordable units, over what is required by our current zoning bylaw. Up to 2 additional stories would be allowed along Mass. Ave, up to one additional story along Broadway. In the following example scenario, the incentive would double the number of affordable units produced in the building:

Mass. Ave./Broadway Affordable Incentive Example Scenario:

	<i>Stories</i>	<i>Total Units</i>	<i>Required 15%</i>	<i>Bonus +7.5%</i>	<i>Bonus +2.5%</i>	<i>Affordable Units</i>	<i>Affordable %</i>
Allowed by right	4	16	3	N/A	N/A	3	15%
+1 story	5	20	3	2	N/A	5	22.5%
+2 stories	6	24	4	1	1	6	25%

Currently, the average rent for a 2-bedroom apartment in Arlington is approximately \$2,875. Looking at newer apartment buildings suggests \$3,600 is a better comparable 2-bedroom rent for projects developed under MBTA Communities zoning. Affordable rents, as defined by Arlington's Inclusionary Zoning bylaw (60% area median income) are \$2,004. At these levels, the proposed density bonuses with affordability requirements should be enough to attract market rate developers to take advantage of the bonuses.

Environmental Incentive

Town plans reflect the need for development criteria that consider sustainability, climate resilience, and ecological land management.¹⁸ Residents have underscored their support for these goals in conversations about MBTA Communities and made specific requests that the Town incorporate such aims in the zoning criteria. The Department of Planning and Community Development explored various options to this end and found the SITES rating system¹⁹ by the Sustainable SITES Initiative to be the best framework to apply in the context of an MBTA

¹⁷ There are limitations on this assumption as buildings grow very large. For example, above a certain height, buildings must be framed in steel instead of wood. Given lot sizes in the district, we do not anticipate many buildings of a scale where this would have a noteworthy impact.

¹⁸ The Arlington Master Plan, Net Zero Action Plan, Hazard Mitigation Plan, Open Space and Recreation Plan, and Public Land Management plans have action items related to working with private actors to realize the Town's goals on these topics.

¹⁹ <https://sustainablesites.org>

Communities. The proposed bonus is of one additional floor for a Gold-level certifiable development on the SITES scale.

Like its companion rating system LEED, SITES has become a standard for landscape design and construction. SITES emphasizes the design, construction, and maintenance of outdoor spaces but, through its synergies with LEED, also ensures healthy and sustainable buildings. SITES is evaluated across ten categories and the system has a maximum score of 200 points. A checklist of SITES prerequisites and credits is attached to this memo. The criteria align well with Arlington's existing bylaws and regulations. The Town's requirements ensure that compliance with SITES is easily within reach. Major developments are already typically asked to manage precipitation beyond the baseline, to provide bike and pedestrian friendly transit options, and to landscape with ecologically appropriate species—all of which are SITES criteria.

SITES is a suitable system for this context because it incentivizes outcomes that the Town wishes to see but does not yet have the capacity to require. For example, residents have requested features like publicly accessible site use (e.g., in the form of pocket parks) be required in the MBTA Communities districts. SITES helps to realize this goal by awarding points to the creation of open space where residents can sit in landscaped outdoor areas, enjoy green streetscapes, and enjoy the benefits of those amenities, like physical activity, mental restoration, enhanced social connection, and equitable site use. Beyond the existing Stormwater Bylaw, Arlington's Engineering Division advises redevelopment projects to manage precipitation on site beyond the baseline and finds that designs can be achieved easily and cost-effectively that meet the 95th percentile precipitation event, in part through the design of functional stormwater features as amenities (e.g., rain gardens). Both best practices are SITES credits.

Even with such strong alignment, it will be necessary to adapt the SITES scorecard for use in Arlington. Certain landscape features to be conserved or enhanced under SITES are not present in the MBTA Communities districts—healthy soils and appropriate vegetation, special status species, to name a couple—while, at the opposite end of the spectrum, some criteria are not required under SITES that are essential to Town goals, such as reducing urban heat island effects. In addition to the standard scorecard, a modified SITES checklist will be tailored for use in Arlington. A draft sample version of such a scorecard is included in Appendix D.

SITES Rating System

SITES is a suitable system for this context because it incentivizes outcomes that the Town wishes to see but does not yet have the capacity to require. For example, publicly accessible landscaped outdoor areas, green streetscapes, and additional stormwater management are all examples of amenities that would count toward the incentive.

The Working Group and DPCD recommend that site plan review for SITES compliance and ongoing reporting be received, assessed, and recorded by DPCD staff. Successful implementation

of these criteria will require that new owners be apprised of the requirements. DPCD recommends that notice of the requirements be recorded with the title for the property.

Key Concepts

Capacity

The scenarios modeled by our consultant Utile include a calculation of “capacity” based on the compliance model published by the state. It is important to note that zoning capacity is meant to measure whether a zone is of ‘reasonable size.’ Capacity is not trying to measure how much new housing will be built. Zoning capacity is a calculation of how many units could be built if every parcel started as an empty lot and was built to a theoretical maximum capacity.

The state’s compliance model calculates how many homes could exist in the proposed district if somehow every existing home were removed, and if every lot was built to the absolute maximum, and if none of the housing had any parking, and if every home was a 1,000 square foot apartment. The compliance model calculates a capacity of 7,268 units in the proposed district. There are approximately 2,100 homes that exist today in the district.

Despite the model showing a theoretical capacity increase of approximately 5,000, Arlington is only likely to see a fraction of that number of additional homes built in the next 10-20 years. There are many practical reasons for this, including:

- Most homeowners are not looking to sell their home so only a small number of homes come up for sale in any given year.
- Most builders are likely to include at least some parking.
- A number of existing properties are condominiums, and coordinating a purchase from all of the owners at once is unlikely in most cases.
- Some homes are newly built and the price to buy them would make it not financially feasible to turn them into multi-family housing.

The Working Group has chosen to create a proposal that over time will result in new multi-family housing and helps us make progress on the goals we share as a community: to be welcoming and inclusive, to be climate leaders, to give access open spaces, and to support vibrant businesses. In contrast, a proposal designed to do the bare minimum will not encourage much, if any, new

Capacity

Zoning capacity is meant to measure whether a zone is of ‘reasonable size.’

Capacity is not trying to measure how much new housing will be built.

The state’s compliance model calculates how many homes could exist in the proposed district if somehow every existing home were removed, and if every lot was built to the absolute maximum, and if none of the housing had any parking, and if every home was a 1,000 square foot apartment.

housing. It might allow us to meet the letter of the law, but it will not help us make progress on the goals that we share as a community.

By-Right

The MBTA Communities / Section 3A law requires Arlington to have at least one zoning district of reasonable size in which multi-family housing (any residential property containing three or more housing units) is permitted by right (without a Special Permit). Individual property owners will have the option to decide if they want to redevelop their property under the new zoning. No property owner will be required to change their property or develop new housing. Construction of any new development will still require applying for a building permit, submitting plans, and completing inspections. It is expected that any new potential development would occur over years or even decades.

Inclusionary Zoning

Arlington's current zoning requires that 15% of dwellings be affordable (i.e., income-restricted) in new multi-family buildings with six dwellings or more. This is commonly called inclusionary zoning. There has been significant public support for allowing multi-family housing at that scale in the MBTA Communities districts to trigger affordability requirements.

Under Section 3A's guidance, municipalities must provide justification for affordability requirements greater than a rate of 10%. The Department of Planning and Community Development has contacted for an economic feasibility analysis showing that our 15% inclusionary zoning rate (currently in place for multi-family development in Town) is economically viable, and we are confident that the analysis will be acceptable to the State. The Working Group has also voted to incentivize a higher percentage of affordable dwellings.

Inclusionary Zoning Approval

The Department of Planning and Community Development has contacted for an economic feasibility analysis showing that our current inclusionary zoning 15% rate is economically viable, and we are confident that the analysis will be acceptable to the State. The Working Group has also voted to incentivize a higher percentage of affordable dwellings.

Implementation

Site Plan Review

Projects built under Arlington's proposed MBTA Communities zoning will be subject to site plan review by the Arlington Redevelopment Board. While site plan review is an administrative process, not discretionary, it will still provide the board and members of the public with an opportunity to review and comment on new project proposals. These reviews will be based on the standards that the ARB currently uses for Environmental Design Review, which include: preservation of landscape, relation of buildings to the environment, open space, traffic and

circulation, surface water drainage, utility service, safety, heritage, microclimate, and sustainable building and site design.

Design Guidelines

Well-developed design guidelines can be a valuable part of the site plan review process, ensuring that builders understand community expectations beforehand. Arlington has existing Residential Design Guidelines²⁰ for single- and two-family housing. There are also Design Standards for Industrial and Commercial development²¹.

SITES Qualification

It will be necessary to adapt the SITES scorecard for use in Arlington. Certain landscape features to be conserved or enhanced under SITES are not present in the MBTA Communities districts—healthy soils and appropriate vegetation, special status species, to name a couple—while, at the opposite end of the spectrum, some criteria are not required under SITES that are essential to Town goals, such as reducing urban heat island effects. In addition to the standard scorecard, a modified SITES checklist will be tailored for use in Arlington. A draft sample version of such a scorecard is included in Appendix D.

The Working Group and DPCD recommend that site plan review for SITES compliance and ongoing reporting be received, assessed, and recorded by DPCD staff. Successful implementation of these criteria will require that new owners be apprised of the requirements. DPCD recommends that notice of the requirements run with the land and be recorded with the title for the property.

Historic Properties

While multi-family housing can be appropriate in historic districts, the Working Group chose to keep our proposal out of the eight Arlington Historic Districts. Development of properties in Historic Districts are subject to architectural review by the Historic District Commission. The Working Group felt that the State might view the inclusion of properties subject to these reviews as an attempt to avoid Section 3A's requirement for a by-right process.

Inspectional Services

Construction of any new development will still require applying for a building permit, submitting plans, and completing inspections. The Inspectional Services Department already oversees building permits and inspections for multi-family and mixed-use development in Arlington, and Section 3A does not make any changes to this part of the building process.

²⁰ <https://www.arlingtonma.gov/home/showpublisheddocument/54518/637472609831970000>

²¹ <https://www.arlingtonma.gov/home/showpublisheddocument/45347/636842906363630000>

Additional Recommendations

The MBTA Communities Working Group was formed to conduct public outreach and engagement, to listen and gather public input, and to translate these varied and diverse public viewpoints into a district map with the accompanying zoning regulations. Beyond the map and zoning regulations, the Working Group would like to make a number of additional recommendations to the town.

Apply our existing street tree planting bylaw to all residential districts

Arlington's Zoning Bylaw has public shade tree standards that apply to Business Districts (Section 6.3) and Industrial Districts (Section 5.6.2.D(5)), but no such standard for Residential Districts. The Working Group encourages the Arlington Redevelopment board to consider adopting similar shade tree standards for Residential Districts, including the multi-family districts proposed for Section 3A compliance.

Create more consistent business districts

The Working Group supports the Arlington Redevelopment Board's efforts to create a more consistent and cohesive Arlington Heights Business District. The Working Group encourages the ARB to pursue similar rezoning efforts in Arlington Center and Capitol Square.

Consider future mixed-use districts

After reviewing the Aug 17, 2023 guidance from the Executive Office of Housing and Livable Communities (EOHLC), the Working Group declined to incorporate new provisions that would allow a requirement for ground floor commercial. Members of the Working Group believed the new provisions did not offer an improvement over the current strategies of incentivizing ground-floor commercial and placing the multi-family district outside of areas zoned for commercial use. Having taken that position, members of the Working Group believe that EOHLC's guidance changes should be part of future mixed-use zoning considerations.

Encourage additional affordable housing opportunities

The MBTA Communities Working Group is recommending a set of bonuses for the inclusion of additional affordable (i.e., income-restricted) housing: an additional story for providing 22.5% affordable units, and an additional two stories for providing 25%. We are aware that the Affordable Housing Trust Fund Board (AHTFB) is also looking at policies that would allow the construction of affordable housing by-right, particularly at scales that would be eligible for Low Income Housing Tax Credits (larger projects that include housing for lower income households). The Working Group encourages the Arlington Redevelopment Board to consider future proposals from the AHTFB, and to tailor the MBTA Communities affordable housing bonuses in a complimentary fashion, in order to accommodate a range of projects scales and types.

Consider additional areas for multi-family housing in a future master plan

As the Working Group was developing the proposal, we considered many locations across Arlington. In particular, locations along or near Summer Street, Park Ave, Mystic Street, Pleasant Street, the Route 2 Access Road and along the Minuteman Bikeway drew our attention. While

these areas were ultimately not included in this proposal, it is not because the Working Group deemed them unsuitable for multi-family housing. We encourage any future Master Planning effort to consider ways to encourage multi-family housing in additional areas of Arlington.

Consider additional actions

The Working Group affirms that the MBTA Communities legislation is one piece in a complex puzzle, and that other actions and policies -- such as those listed in Arlington's Community Equity Audit and Fair Housing Action Plan -- are needed to address the region's housing challenges.

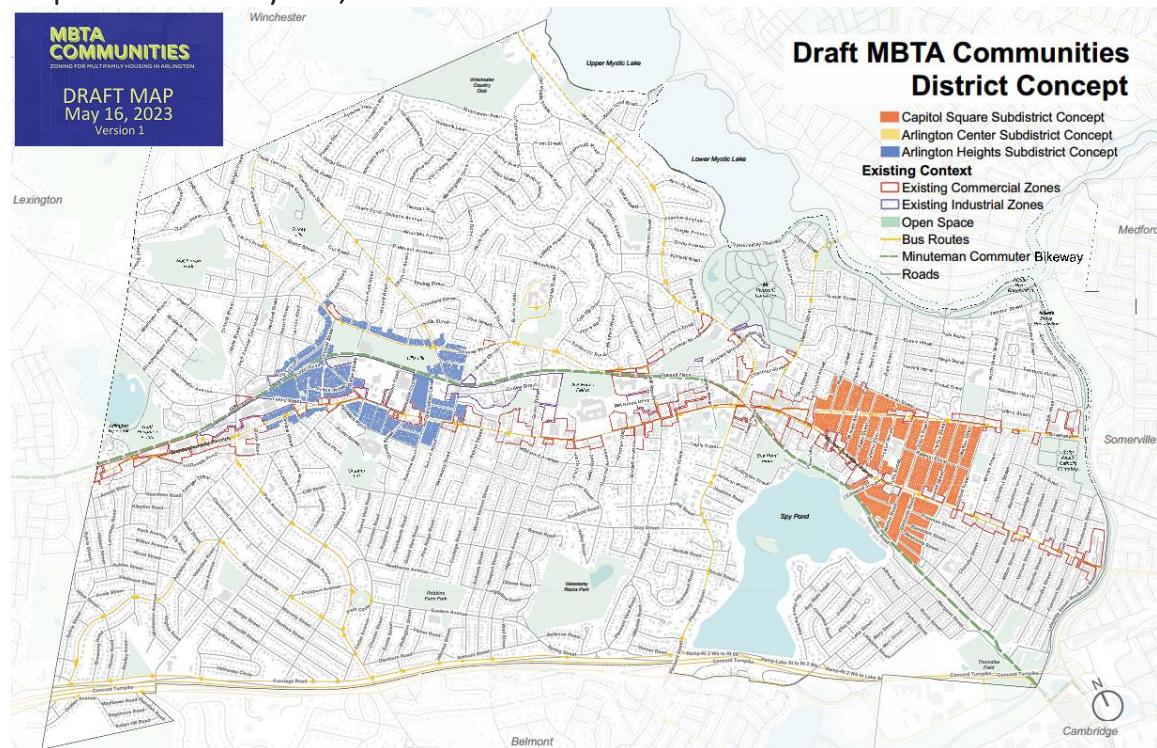
Appendix A: Map Iterations

Over the past several months, the Working Group has both reviewed themselves and received comment from the community on more than ten different versions of maps for Arlington's MBTA Communities overlay zone.

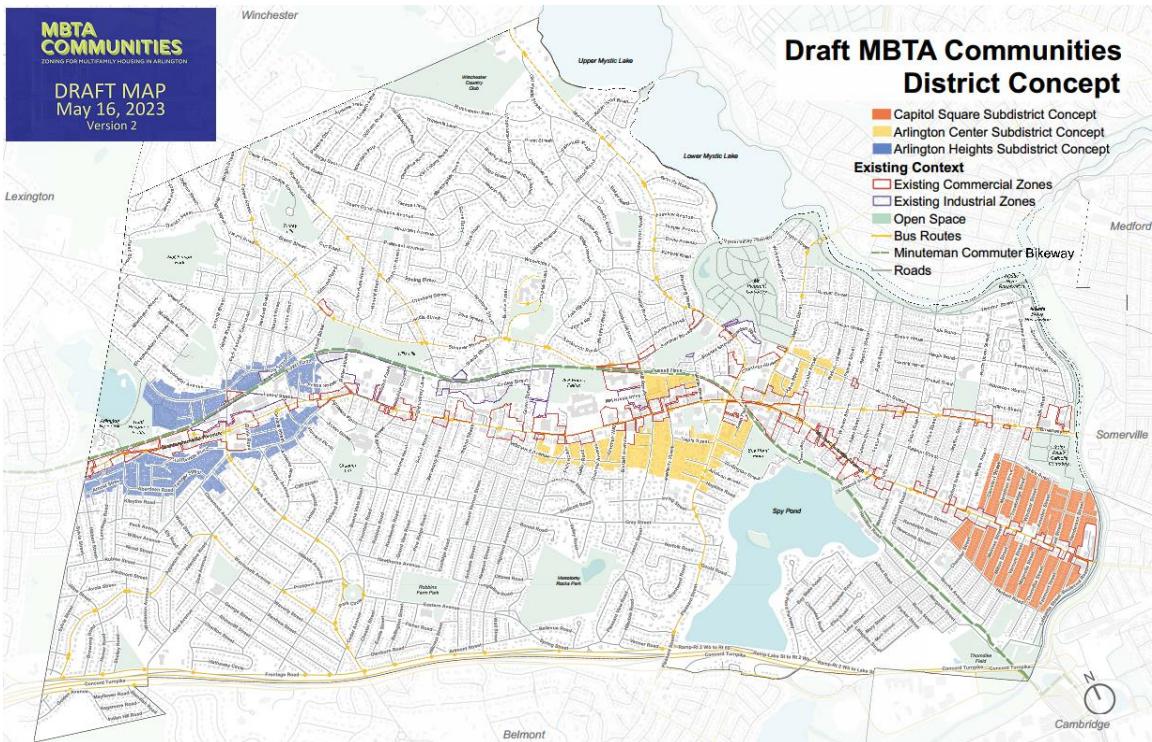
Each iteration of the map has reflected comments, questions, suggestions, and concerns from the Working Group and from the community. With early maps the Working Group was largely focused on "where" on the map the zones might go. As our work progressed, we also began to focus on "what sorts of building" would be allowed in the various subdistricts. As you follow the progression of maps you can see that they show ideas added, considered, modified, and discarded. In some cases, ideas from earlier maps return in later maps.

Looking at all the maps, starting with the May 16th version and ending with the proposal going to the ARB, the maps show the iterative nature of the Working Group's effort to listen to feedback, consider various perspectives, and ultimately to propose an optimal solution for Arlington.

Map Iterations - May 16th, 2023

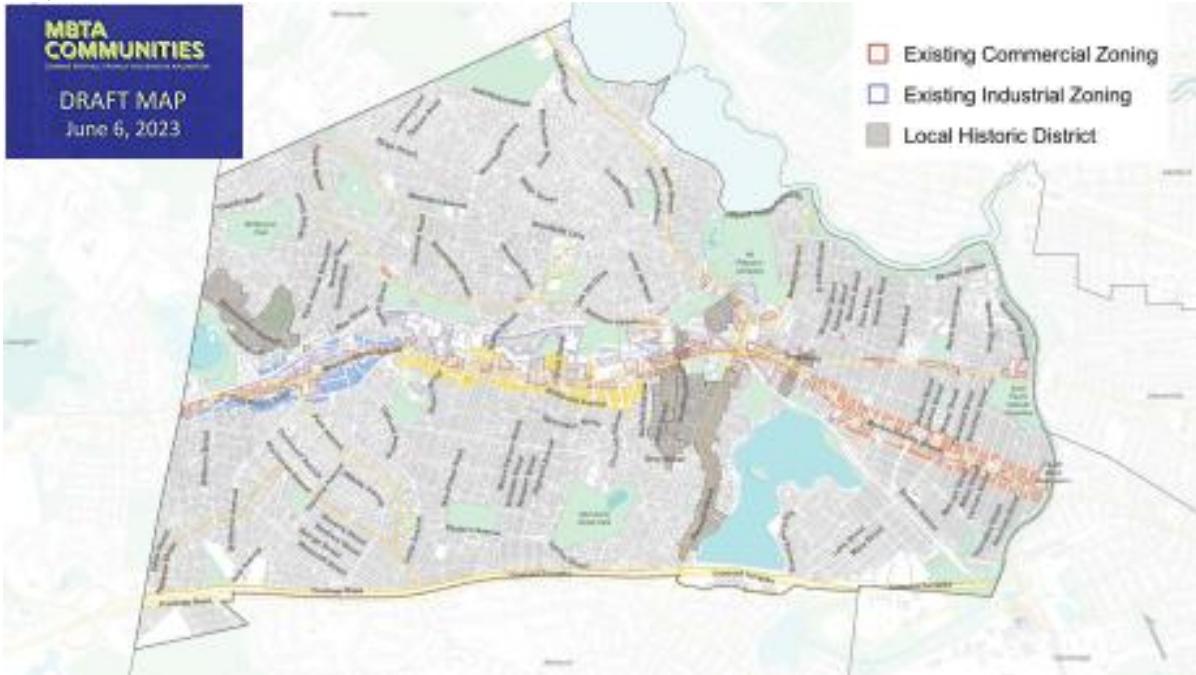


<https://www.arlingtonma.gov/home/showpublisheddocument/65975/638236616845500000>



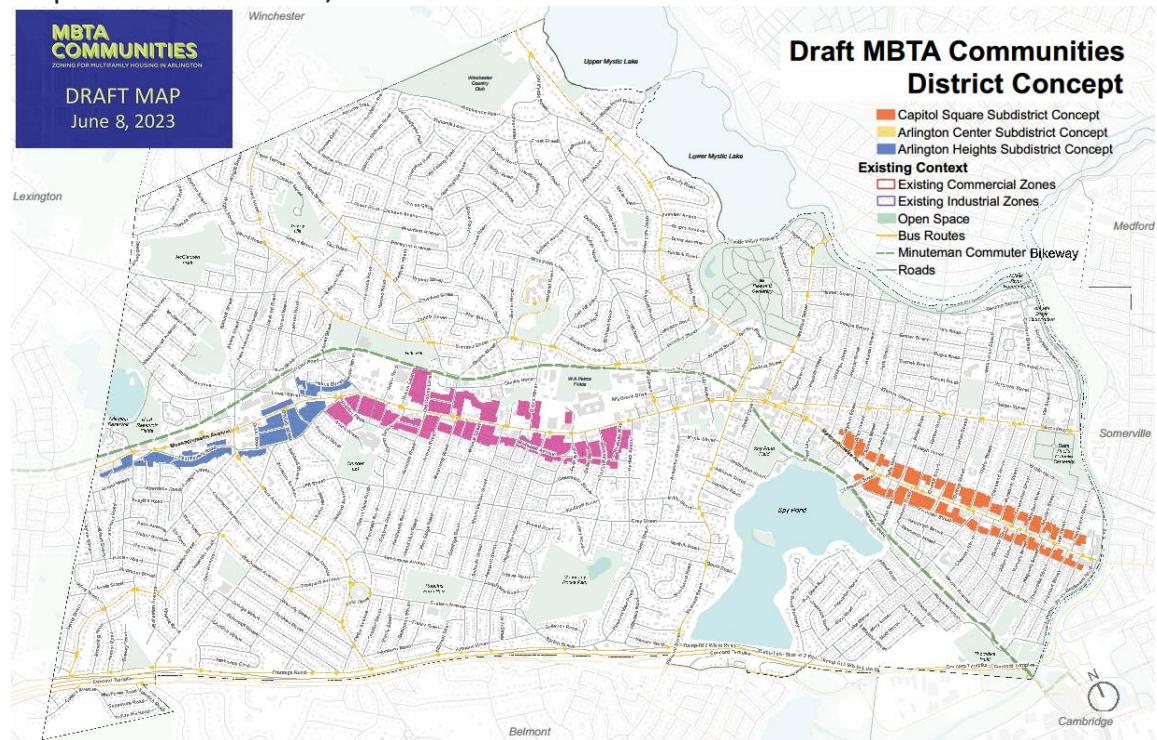
<https://www.arlingtonma.gov/home/showpublisheddocument/65977/638236616852070000>

Map Iterations - June 6th, 2023



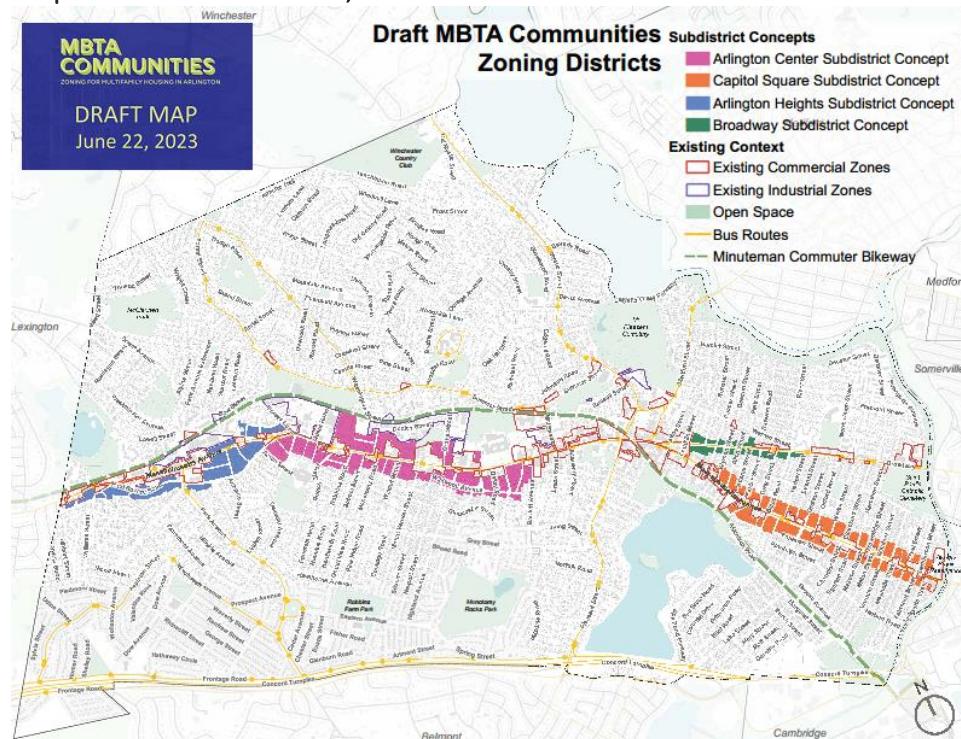
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Map Iterations - June 8th, 2023



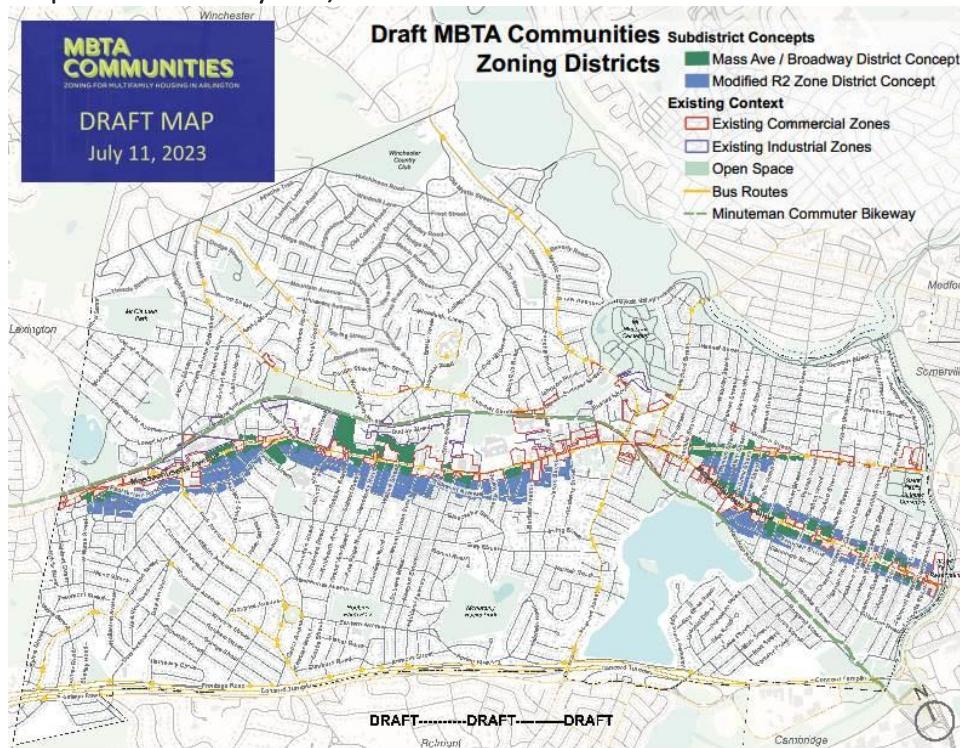
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Map Iterations - June 22nd, 2023



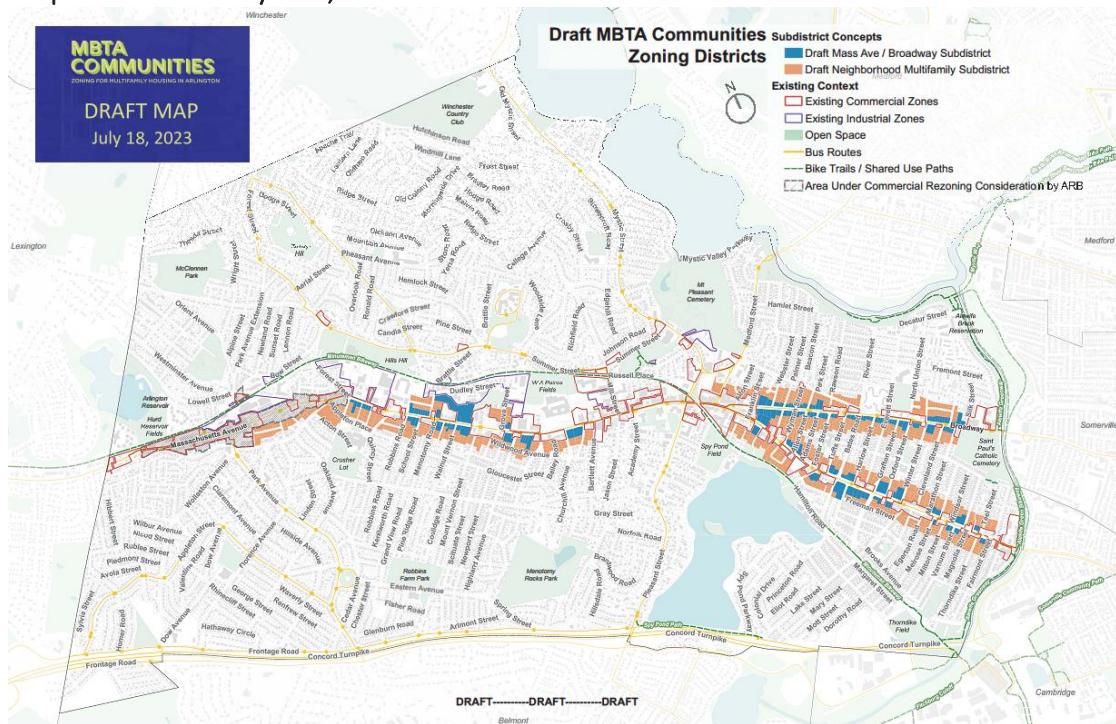
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Map Iterations - July 11th, 2023



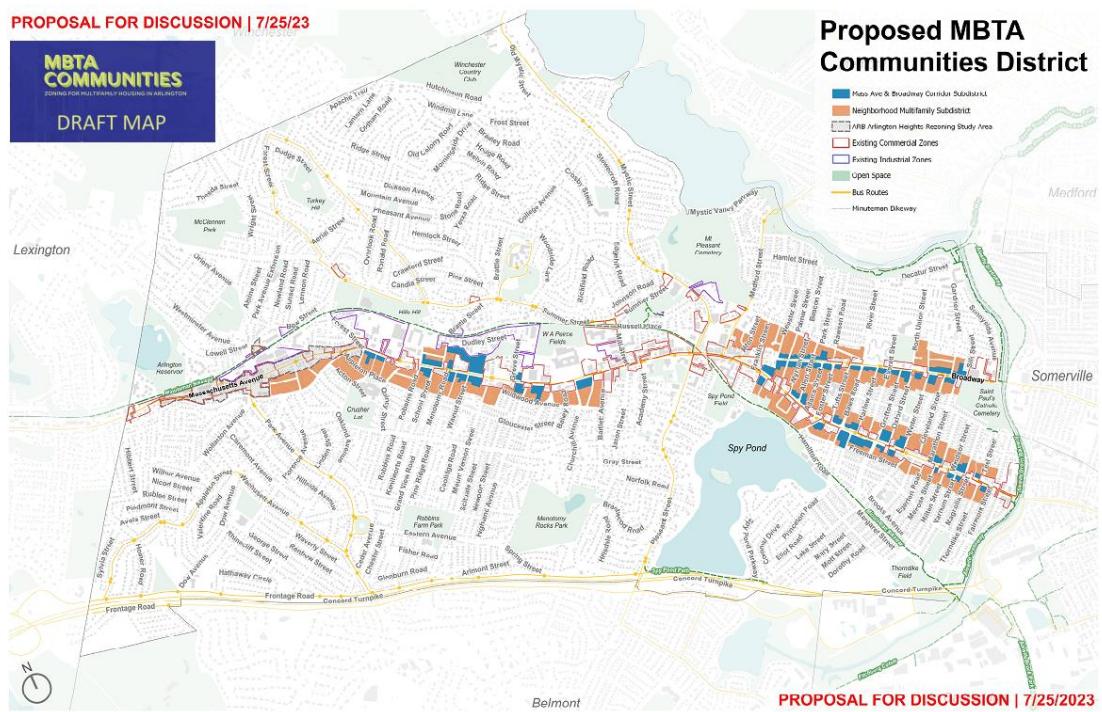
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Map Iterations - July 18th, 2023



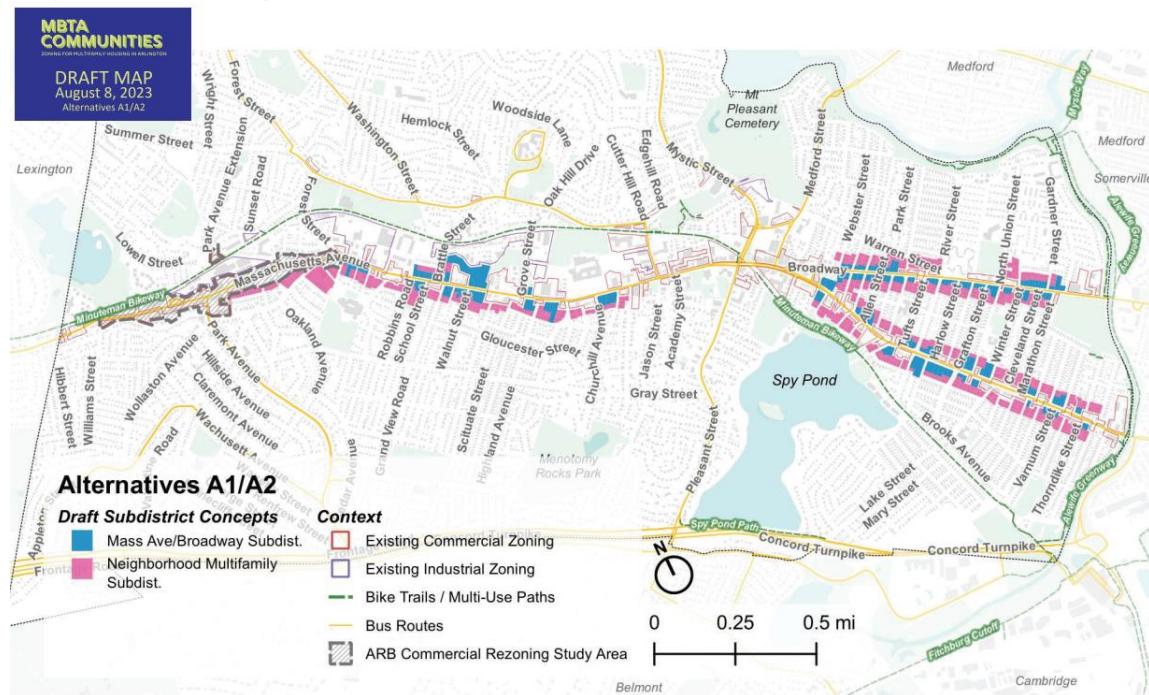
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Map Iterations - July 25th, 2023

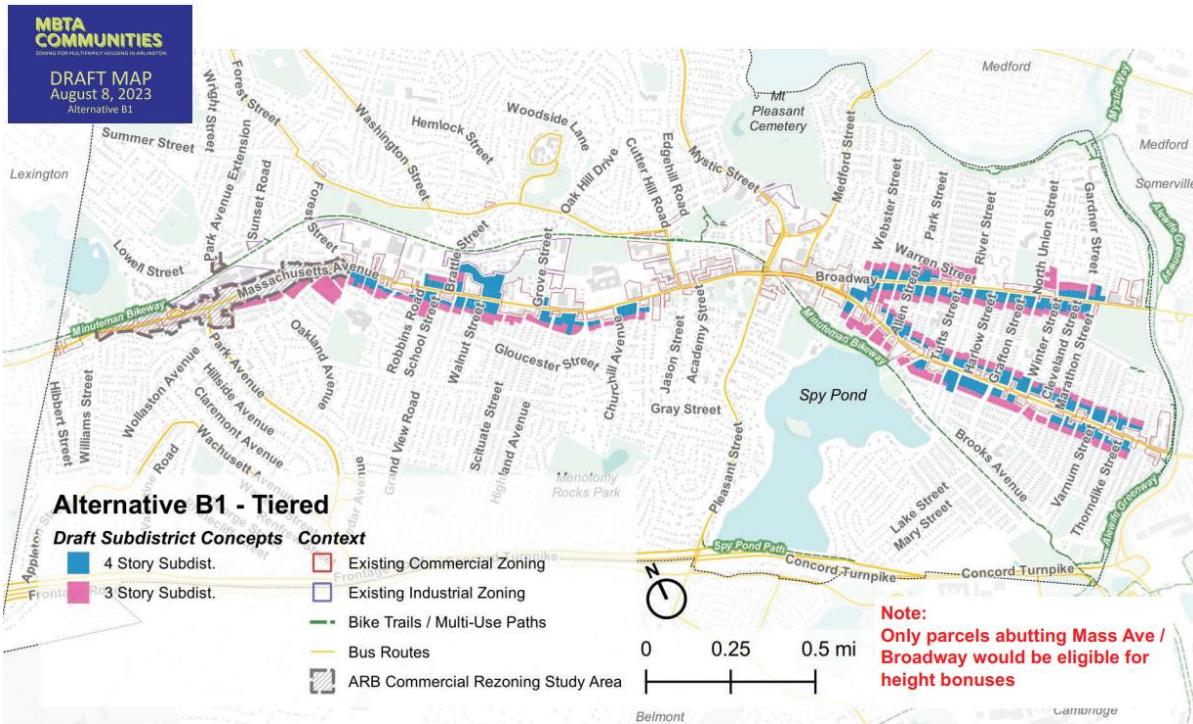


<https://www.arlingtonma.gov/home/showpublisheddocument/66215/638258738820870000>

Map Iterations - August 8th, 2023

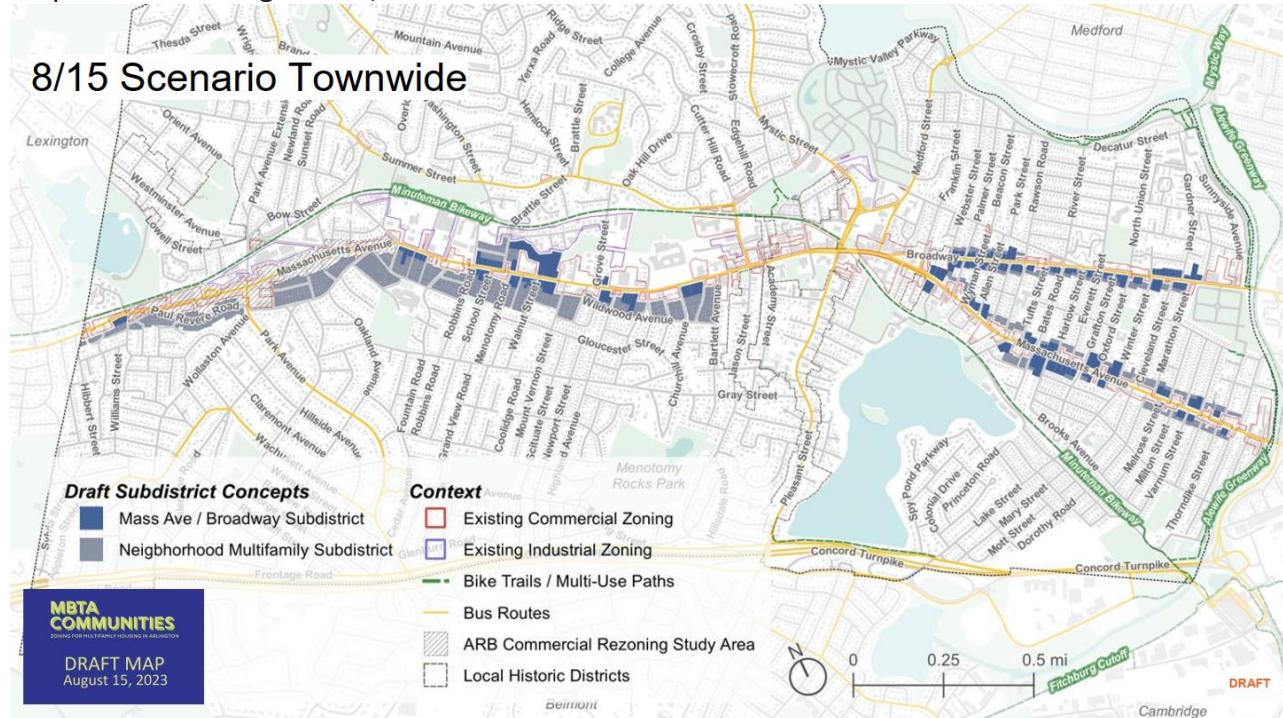


<https://www.arlingtonma.gov/home/showpublisheddocument/66437/638276997410670000>



<https://www.arlingtonma.gov/home/showpublisheddocument/66435/638276997687570000>

Map Iterations - August 15th, 2023



Appendix B: Housing Recommendations in the Community Equity Audit

The Community Equity Audit,²² completed for the Town in January of this year, includes three recommendations related to housing. Recommendation 12 is particularly relevant to our implementation of the MBTA

Communities law. We have re-produced the three housing-related recommendations in this appendix. Please the Community Equity Audit for much more detail.

Community Equity Audit:

Our conversations with residents revealed the types of units being built in the Town do not fit the needs of the community's most vulnerable members, which was also highlighted in the Arlington Fair Housing Action Study.

Recommendation 10:

Establish and hire for a housing specialist or liaison position.

- a. Establish a pathway for the Town to expand capacity to address fair housing complaints and renter's rights violations.
- b. Develop and run a local renter support network and information hub.
 - i. Robust Renter's rights information.
 - ii. Connections to legal aid.
 - iii. Landlord/ tenant relations.
 - iv. Available housing options.

Recommendation 11:

Develop a community fund for rental assistance and rental housing improvement programs and establish a centralized system for grant writing, and fund procurement.

Recommendation 12:

Address restrictive policies for residential zoning districts in order to allow for desegregation.

1. Remove the requirement for a special permit to develop multifamily units.
2. Allow development of multifamily housing in the R0 and R1 zoning districts.
3. Allow for an inclusionary zoning density bonus in high-density residential zoning districts.

²² <https://www.arlingtonma.gov/home/showpublisheddocument/63916/638114686699730000>

Appendix C: Housing Strategies in the Fair Housing Action Plan

The Fair Housing Action Plan²³ is a key document that provides a pathway forward for the Town to advance its commitment to housing for all. These are the proposed recommendations:

Strategy A: Increase awareness, education, and enforcement of fair housing laws.

- Pass a resolution that codifies Arlington's commitment to fair housing.
- Through notices and marketing materials, offer fair housing education and enforcement reminders to real estate professionals operating in Arlington.
- Continue holding public discussions on the impact of housing, the role of direct and indirect discrimination, and fair housing law.
- Contract with MCAD, Metro Housing Boston, or Suffolk Law School's Housing Discrimination Testing Program to provide fair housing training, testing, and enforcement in Arlington specifically.
- Work with Town boards and commissions as well as local nonprofits to disseminate educational materials on fair housing.

Strategy B: Alter Town governance structures and processes to address fair housing concerns.

- Add a Housing Working Group to the Arlington Human Rights Commission that focuses on fair housing issues. A liaison from the Department of Planning and Community Development for this working group should coordinate interdepartmental housing concerns and policy.
- Create a protocol for responding to fair housing complaints or allegations of fair housing violations that is uniform across commissions. The protocol should designate a commission and a staff person with responsibility over the complaint process.
- Change the existing complaint-driven code enforcement system to one with regular, proactive inspections.
- Explore alterations to the Town Meeting schedule and virtual participation methods that could make Town Meeting membership feasible for people who cannot join Town Meeting under the current procedures.
- Institute Equity Impact Assessments for each item on the Town Meeting warrant, particularly housing and development related items.

Strategy C: Reform the Zoning Bylaw to encourage development that increases fair housing choice.

- Reduce the overall complexity of the Zoning Bylaw through recodification.
- Allow two-family development by right in nominally single-family districts where two-family dwellings were historically commonplace.

²³ <https://www.arlingtonma.gov/home/showpublisheddocument/57214/637641171662530000>

- Allow three-family, townhouse, and multifamily housing options by right in districts nominally meant for them.
- In districts intended for higher densities, only allow single-family developments by Special Permit, if at all.
- Amend restrictive dimensional and parking requirements for multifamily uses that make development infeasible in districts where those uses are appropriate.
- Explore zoning amendments that would allow the conversion of large existing single-family homes to two- and three-family homes.
- Explore zoning amendments that would allow two- and three-family homes in single-family districts where the total building size is similar to that of abutting single-family homes.
- Ensure zoning conforms with new state-level requirements for MBTA communities.
- Provide loans or grants to homeowners to develop accessory dwelling units in exchange for affordability restrictions.
- Raise the threshold for EDR review, particularly on major corridors, replacing that review with performance standards for new developments.
- Limit subjective criteria in discretionary reviews, eliminate review standards that perpetuate segregation, and define clear performance and design standards that projects will be reviewed against.
- Consider distinct density and dimensional regulations for development that is 100% affordable housing.
- Consider approvals by right for developments that are 100% affordable housing.

Strategy D: Use non-zoning techniques to encourage development that increases fair housing choice.

- Provide opportunities for housing developments that would trigger the Town's inclusionary zoning requirement.
- Amend Arlington's local preference policy to be more welcoming to nonresidents.
- Draft guidelines for addressing accessibility concerns on historic properties.
- Institute clear conservation performance standards for properties in conservation areas zoned for multifamily uses. These standards, if followed, should ensure approval from the Conservation Commission.
- Plan for and permit new housing development that could address Arlington's share of the regional housing supply gap.
- Encourage new developments to include sufficient accessible units.
- Prioritize family-sized units for new affordable housing units, including purpose-built affordable housing and inclusionary units.

Strategy E: Use Town resources to create opportunities to meet housing need.

- Explore expansions to Arlington's tax exemption system that could apply to all income-eligible members of protected classes.
- Set a minimum annual dollar amount and minimum percent of CPA funds (above the statutory minimum) and CDBG funds that will go to address housing needs.
- Continue working with affordable housing providers and strategically using CPA and CDBG funds to create opportunities for HOME funding.
- Assess alternative funding resources such as housing bonds.
- Offer grants or low-interest loans to retrofit historic housing for accessibility.
- Explore funding opportunities to assist small property owners with lead abatement or removal.

Strategy F: Alter Arlington Housing Authority policy to increase fair housing choice.

- Explore the voluntary adoption of Small Area Fair Market Rents or exception payment standards.
- Eliminate rental application fees for voucher holders.
- Encourage landlords to follow HUD's guidance on the use of criminal backgrounds in screening tenants.
- Eliminate barriers to tenant participation in AHA meetings by providing childcare and/or meeting at alternative times and days of the week.

Strategy G: Protect tenants in protected classes from displacement.

- Bolster protections of tenants by requiring property owners to give significant notice to tenants when they are preparing to redevelop or sell a property and when they are planning to raise rents.
- Advocate for passage of the Tenant Opportunity to Purchase Act at the state level. If it passes, support tenant purchasers through funding and technical support.

Strategy H: Encourage access to private housing by protected classes.

- Conduct targeted outreach and provide tenant application assistance and support to persons with disabilities, including individuals transitioning from institutional settings and individuals who are at risk of institutionalization.
- Maintain a database of housing that is accessible to persons with disabilities.
- Partner with one or more financial institutions and quasi-public institutions like the Massachusetts Housing Partnership to market available financing options to protected classes. Ensure those mortgage products are fair to borrowers.

Appendix D: Draft Sample SITES Scorecard

MBTA COMMUNITIES BONUS SITES CERTIFICATION

Estimate points below (key at bottom)			PREREQUISITE OR CREDIT #	TITLE	CASE / OPTION / THRESHOLD	POINTS	POSSIBLE POINTS PER CREDIT
YES	?	NO					
0	0	0	0: REQUIREMENTS				
Y			REQ P0.1	Redevelop degraded sites			
Y			REQ P0.2	Locate projects within existing developed areas			
Y			REQ P0.3	Connect to multi-modal transit networks			
Y			REQ P0.4	Use an integrative design process			
Y			REQ P0.5	Reduce urban heat island effects			
Y			REQ P0.6	Reduce light pollution			
Y			REQ P0.7	Plan to monitor and report site performance			
Y			REQ P0.8	Engage users and stakeholders			

0	0	0	1: SITE DESIGN - WATER	Possible Points:	25
Y			WATER P1.1 Manage precipitation on site		
Y			WATER P1.2 Reduce water use for landscape irrigation		
			WATER C3.1 Manage precipitation beyond baseline	80th percentile precipitation event	6
				90th percentile precipitation event	8
				95th percentile precipitation event	10
			WATER C3.2 Reduce outdoor water use	Option 1: Reduce outdoor water use	5
				Option 2: Significantly reduce outdoor water use	6
				Option 3: Eliminate outdoor water use	7
			WATER C3.3 Design functional stormwater features as amenities	50% of stormwater features	6
				100% of stormwater features	8

0	0	0	2: SITE DESIGN - SOIL + VEGETATION	Possible Points:	30
Y			SOIL+VEG P2.1 Control and manage invasive plants	Case 1: No invasive plants found on site Case 2: Invasive plants identified on site	
Y			SOIL+VEG P2.2 Restore soils disturbed during construction		
Y			SOIL+VEG P2.3 Use appropriate plants		
			SOIL+VEG C2.1 Optimize biomass	Minimal biomass	
				Low biomass	4
				Medium biomass	6
				High biomass	10
			SOIL+VEG C2.2 Conserve and use native plants	40% total native plant score	4
				60% total native plant score	6
			SOIL+VEG C2.3 Conserve and restore native plant communities	20% total native plant community score	3
				40% total native plant community score	4
				60% total native plant community score	5
			SOIL+VEG C2.4 Use vegetation to minimize building energy use (project must have building on site)	No buildings present on site	
				Provide shaded area - 30% shaded	3
				Provide shaded area - 60% shaded	5
			SOIL+VEG C2.5 Restore soils disturbed by previous development	Low point score	3
				Medium point score	4
				High point score	5

0	0	0	3. HUMAN HEALTH + WELL BEING	Possible Points:	20
			HHWB C3.1 Provide optimum site accessibility, safety, and wayfinding		2
			HHWB C3.2 Promote equitable site use		2
			HHWB C3.3 Support mental restoration		2
			HHWB C3.4 Support physical activity		2
			HHWB C3.5 Support social connection		2
			HHWB C3.6 Encourage fuel efficient and multi-modal transportation		4
			HHWB C3.7 Minimize exposure to environmental tobacco smoke	Option 1: Designate smoke-free zones	1
				Option 2: Prohibit smoking on site	2
			HHWB C3.8 Support local economy		4

0	0	0	3. OPERATIONS + MAINTENANCE	Possible Points:	25
			O+M C3.1 Recycle organic matter	100% of vegetation trimmings + food waste recycled / composted off site	5
				100% of vegetation trimmings + food waste recycled / composted on site	7
			O+M C3.2 Minimize pesticide and fertilizer use	Option 1: Plant health care plan	6
				Option 2: Best management practices for plant health care	8
			O+M C3.3 Use renewable sources for electricity needs	Option 2: Arlington Community Electricity - Local Greener (50%)	8
				Option 2: Arlington Community Electricity - Local Greenest (100%)	10

0	0	0	4. EDUCATION + PERFORMANCE MONITORING	Possible Points:	5
			EDUCATION C1.1 Promote sustainability awareness and education	Option 1: Educational and interpretive elements	3
				Option 2: Additional education	4
			EDUCATION C2.2 Develop and communicate a case study		1

0	0	0	5. INNOVATION OR EXEMPLARY PERFORMANCE	Possible Bonus Points:	5
			INNOVATION C1.1 (BONUS POINTS)	Innovation or exemplary performance	Option 1: Exemplary performance 2 2 Option 2: Innovation 3 3

YES ? NO

0	0	0	TOTAL ESTIMATED POINTS	Total Possible Points:	100
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KEY	Certification Levels	Points
YES Project confident points are achievable	CERTIFIED	50
? Project striving to achieve points, not 100% confident	SILVER	70
NO Project is unable to achieve these credit points	GOLD	80
	PLATINUM	90